



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 28 2014

**CERTIFIED MAIL 7009 1680 0000 7663 6391**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Ms. Susan J. Sevy  
Environmental Compliance Manager  
Clean Harbors Environmental Services, Inc.  
2930 Independence Road  
Cleveland, Ohio 44115

Re: Notice of Violation  
Compliance Evaluation Inspection

Wastewater Treatment Plant  
2900 Rockefeller Avenue  
Cleveland, Ohio 44115  
EPA ID No.: OHD000724153

Transfer Facility  
2930 Independence Road  
Cleveland, Ohio 44115  
EPA ID No: MAD039322250

Dear Ms. Sevy:

On December 11, 2013, a representative of the U.S. Environmental Protection Agency inspected the Clean Harbors Environmental Services, Inc. ("CHESI") Wastewater Treatment Plant ("CHESI-WTP") and the CHESI Transfer Facility ("CHESI-TF") in Cleveland, Ohio. The purpose of the inspection was to evaluate CHESI's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*, relating to the generation, treatment, and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CHESI personnel, on a review of records, and on personal observations by the inspector while inspecting the Facility, EPA finds that CHESI – WTP and CHESI – TF are in violation of certain requirements of the Ohio Administrative Code (OAC) and of the United States Code of Federal Regulations (CFR) as follows:

1. A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a manifest. A generator must designate on the manifest one facility which is permitted to handle the waste described on the manifest. See, OAC 3745-52-20(A) and (B) [40 CFR § 262.20(a) and (b)].

At the time of the inspection, a 55-gallon drum of "Aerosols for Incineration" and a 55-gallon drum of "Ignitable Waste Liquids" that had been generated from maintenance activities at CHESI-WTP had been transported to and were being stored at the maintenance plant at CHESI-TF. These facilities are not considered to be on contiguous property. A manifest was not used to transport these wastes and CHESI-TF is not permitted to accept hazardous wastes for storage. CHESI-WTP, therefore, violated the above-mentioned generator manifesting requirements.



2. According to OAC 3745-52-11 [40 CFR § 262.11], a person who generates a solid waste must determine if that waste is a hazardous waste. According to OAC 3745-52-40(C) [40 CFR § 262.40(c)], a generator must keep records of any test results, waste analyses, or other determinations for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal facility.

At the time of the inspection, a container of spent antifreeze was accumulating in the Field Services building at the CHESI-TF. A waste determination for used antifreeze had been made using generator knowledge. The documentation supporting the determination, however, did not appear to consider the properties of the material after use, and was inadequate. CHESI, therefore, violated the above-mentioned hazardous waste determination requirement.

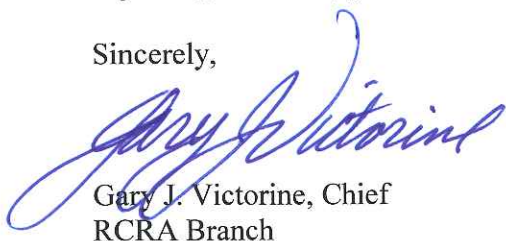
3. A generator of used oil who stores the oil in containers must label or mark clearly those containers with the words "Used Oil." See, OAC 3745-279-22(C)(1) [40 CFR § 279.22(c)(1)].

At the time of the inspection, CHESI-TF was accumulating used oil in a 55-gallon drum located in the maintenance plant. The drum was labeled as "Waste Oil." In the Field Services building, filters containing used oil were hot-draining into a containment pallet. The pallet was not labeled. Also, a 55-gallon container of used coolant was labeled as "Waste Coolant." According to Ms. Sevy, the coolant is managed as used oil. None of these three containers was marked with the words "Used Oil." CHESI, therefore, violated the above-mentioned used oil generator requirement.

At this time, EPA is not requiring CHESI-TF to apply for an Ohio hazardous waste storage permit so long as CHESI-TF immediately stops accepting and storing wastes generated at CHESI-WTP, as noted in Item 1, above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation, and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with each of the above requirements.

You should submit your response to Brenda Whitney, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney at (312) 353-4796.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Karen Nesbit, OEPA (Karen.Nesbit@epa.ohio.gov)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**Compliance Evaluation Inspection Report**

**Date of Inspection:** December 11, 2013

**Facility Name:** Clean Harbors

**Facility Address:** 2900 Rockefeller Avenue  
Cleveland, Ohio 44115

**EPA RCRA ID Number:** OHD000724153

**Generator Status:** Large Quantity Generator

**Transfer Facility Address:** 2930 Independence Road  
Cleveland, Ohio 44115

**EPA RCRA ID Number:** MAD039322250

**Generator Status:** Conditionally Exempt Small Quantity Generator

**Facility Contact:** Susan J. Sevy  
Environmental Compliance Manager

**U.S. EPA Inspector:** Brenda Whitney - Environmental Engineer  
Resource Conservation and Recovery Act (RCRA) Branch  
Compliance Section 2

**Prepared By:** Brenda Whitney  
Brenda Whitney  
Environmental Engineer  
Compliance Section 2

**Date Completed:** 01 / 17 / 2014  
Month / Day / Year

**Accepted By:** Julie Morris  
Julie Morris  
Chief  
Compliance Section 2

**Date Accepted:** 1 / 21 / 14  
Month / Day / Year

## **Purpose of Inspection**

I conducted an unannounced Compliance Evaluation Inspection (CEI or “inspection”) of two Clean Harbors Environmental Services, Inc., (CHESI) facilities located in Cleveland, Ohio, on December 11, 2013. The CHESI wastewater treatment plant (“CHESI - WTP”) is located at 2900 Rockefeller Avenue in Cleveland, Ohio, and carries the EPA ID number OHD000724153. The CHESI transfer facility (“CHESI – TF”) and maintenance garages are under the transporter EPA ID number MAD039322250. This CEI was an evaluation of CHESI’s compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations.

CHESI – WTP had notified the Ohio Environmental Protection Agency (OEPA) as a large quantity generator (LQG) of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. At the time of the inspection, however, representatives of the facility stated that CHESI - WTP is a small quantity generator, or is possibly conditionally exempt. They also noted that the LQG status is kept because of the slight possibility that their filter cake fails testing procedures or in the event of a non-routine mass disposal from a clean-out or similar happening.

CHESI – TF had notified under the Massachusetts ID number as a non-generator. This facility was operating as a conditionally exempt small quantity generator (CESQG) at the time of the inspection.

Karen Nesbit, an Environmental Specialist with OEPA, was unable to accompany me on this CEI.

## **Participants**

<b>Tracy A. Balcer</b> Facility Coordinator	CHESI
<b>Albert Benavides</b> General Manager	CHESI
<b>Dominic E. Okon</b> Laboratory Manager	CHESI
<b>Luz E. Marrero</b> Compliance Guard – Cleveland Plant	CHESI
<b>Susan J. Sevy</b> – Via Telephone Environmental Compliance Manager	CHESI
<b>Michael Petkovich</b> Director of Facility Operations Waste Water Treatment	CHESI
<b>Brenda Whitney</b> Environmental Engineer	EPA

## **Introduction**

Upon arrival at the facility, I displayed my credentials to Ms. Balcer who granted me entrance to the facility. She had me sign into a log book, which did not include any disclaimers, and she gave me a visitor's badge. Ms. Balcer was on the phone with Ms. Sevy at this time. I spoke with Ms. Sevy, who was on route to Cincinnati for a business meeting. The determination was made that she would continue on her way to Cincinnati and would not turn back for the inspection. She requested that we include her in the close-out meeting and that any questions that could not be answered during the inspection be directed to her.

Ms. Balcer introduced me to Mr. Okon, Mr. Benavides, and Ms. Marrero. I delineated the purpose and logistics of the CEI during this introductory meeting. We discussed the processes and waste management practices at both CHESI – WTP and CHESI – TF. I informed the representatives that I would be taking waste-related photographs in each facility as necessary. I also provided Ms. Balcer with three informational handouts: *Onsite Pollution Prevention Assistance (OEPA brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*. We discussed EPA's policy regarding confidential business information (CBI) and agreed to make a determination during the close-out discussion as to whether or not to claim CBI for any of the information gathered during the inspection. After this introduction, we departed for a tour of the complex.

## **Site Description**

The following information about CHESI is based on the personal observations of the EPA inspector and on representations made during the CEI by the facility personnel identified above or within the text unless otherwise specified.

The CHESI – WTP includes the laboratory, offices, and wastewater treatment plant. A separate outbuilding houses the Administrative offices. CHESI - TF includes the maintenance department and the truck to truck drum hub, which is another name for CHESI's transfer facility. The mechanics and field services departments are also part of CHESI - TF. The two facilities are located across a public road from one another, and are considered by the OEPA to be non-contiguous property, hence the separate EPA ID numbers.

The CHESI - WTP accepts hazardous inorganic bulk and drum wastes for treatment. Liquid wastes are brought for wastewater treatment, which is a process regulated under the Clean Water Act. According to facility personnel, these wastes are input into the wastewater treatment system within 24 hours of acceptance at the site. Other materials which cannot be processed in the wastewater treatment plant are usually shipped to another Clean Harbors facility – usually Spring Grove or El Dorado. Some waste streams may have 1-5% oil content. The water is decanted from these loads, and the oil collects in a tank for off-site recycling.

Prior to acceptance of a new waste stream at this facility, the generator will provide information to CHESI in a profile, including information regarding oil content and the rebuttable presumption. If the information in the profile is incomplete or appears unusual, the laboratory may reject the waste or ask for a sample of the waste to be shipped to them for testing. If the sample fails, then the generator is responsible for re-testing, or it is sent for third party analysis.

Pre-accepted incoming wastes are delivered to the facility on a hazardous waste manifest. CHESI - WTP terminates the manifest as the Destination Facility. CHESI - WTP fills out an Incoming Truck Tracking Sheet for each load, which details all of the information that accompanies each load from arrival time to residence time in treatment. A physical sample of each load is taken for analysis at the laboratory to determine treatment recipes. The lab runs analyticals of each sample which include, but are not limited to, metals and pH. If the load has unusual characteristics, or is a drum load with several different types of compatible waste in it, a red flag might be attached to the treatment recipe. This notice must be discussed and approved by multiple supervisory levels before the load can be treated. In all cases, the laboratory operators direct the drivers to the appropriate tank or reactor to off-load for treatment. All data from each load is input into the CHESI I-Drive System.

Drivers for bulk loads remain with the shipment until it is cleared for off-loading. In the event that either a partial or full load is to be rejected, the driver is there to accept the load and the original manifest will be updated and sent on with the driver. Drivers that deliver drums to the drum hub at CHESI - TF, however, do not stay with the shipment because they have ten days to process the shipment. These loads, if rejected for treatment at CHESI-WTP, are issued new manifests with CHESI as the "Offerer" of the shipment to an alternate destination as approved by the original generator.

In regards to the treatment process at CHESI-WTP, the system consists very generally of pre-treatment reactors, mix tanks, sludge reconditioning tanks and filter presses. Reduction/Oxidation reactions occur in the pre-treatment reactors as needed. The precipitate goes to one of the outdoor mix tanks. The solids content will dictate to which mix tank the sludge is directed. Effluent from the pre-treatment reactor goes into a constant treatment unit (CTU) before being discharged to the sewer. The materials in the mix tanks are then pumped to reconditioning tanks before heading to the filter press for dewatering. The filter cake is sampled to determine characteristics, and has been sent off-site as non-hazardous waste with the last exception having happened approximately 14 years ago.

CHESI - WTP also has the capability of treating F039 listed hazardous waste. This waste is no longer frequently treated at this facility. The equipment is dedicated for the treatment of this waste so that none of the other tanks are compromised with the listing. One of the tanks dedicated to the process, Tank 5, was cleaned out this past year and the materials were determined to be listed. This waste was exported to Canada.

Some reagents for the treatment processes are stored in tanks. Tanks A and B are reserved for used caustic materials that would otherwise be hazardous wastes. According to CHESI - WTP representatives, the used materials have pH value and do not contain any underlying hazardous constituents. Virgin peroxide is stored in another tank.

The main waste generated at the CHESI - WTP is non-hazardous filter cake from the wastewater treatment process. Minimal quantities of hazardous waste are generated from the F039 process and from the laboratory.

As noted before, the CHESI - TF consists of the drum hub, maintenance areas, and the field services department. Wastes generated at the CHESI - TF include used oils, aerosols, and other



maintenance-related wastes such as antifreeze. Universal wastes are generated at both facilities, but are stored at CHESI - TF. Hazardous wastes from off-site customers are delivered to the transfer facility, and may be processed at CHESI - WTP, transshipped to another Clean Harbors facility, or rejected to another alternate destination.

### **Site Tour**

The tour began in the laboratory. Two 5-gallon buckets were observed in a wet-chemistry hood. According to Mr. Okon, the material in the buckets may be used in the pre-treatment system. However, the buckets were both closed and labeled as "Hazardous Waste." A decontamination eye wash and shower was in the laboratory. According to Mr. Benavides, the showers throughout the plant are inspected once a week and are visually checked on a daily basis. A flammable-proof cabinet in the laboratory held several containers of materials that were either to be used again or were possibly no longer usable (See Appendix A: Photograph 1). The status of some of the materials was unclear.

The tour continued outside. The storage tanks for used oil, peroxide, and used caustic were in a secondary containment dike. The used oil tank was labeled as "Used Oil" (See Appendix A: Photograph 2). One additional tank in the area was empty at the time. It will be used for calcium chloride in the sludge conditioning process.

We next passed Station 1, which is the drum processing station. Empty containers are sent to the Clean Harbors in Hebron, Ohio, to be shredded. If the drums cannot be emptied, they are rejected with a new manifest. Solids that cannot be treated in the process are collected in a 30-gallon hazardous waste satellite container near the loading dock. The drum was labeled as "Hazardous Waste" and was closed.

The pre-treatment area inside the building includes the pre-treatment tanks, scrubbers and chemical manifolds. No hazardous waste was observed in this building. The sludge from the pretreatment tanks empties in to the mixing tanks outside. Also in this tank farm is a 200,000-gallon tank which discharges the treated effluent directly to the sewer.

Back inside the plant, I observed the 15,000-gallon CTU, which is used to break up excess polymer in the wastewaters. Ferric sulfate or alum are added to this tank to drop out precipitates to be sent to the mix tanks. The effluent is sent to the discharge tank. The sludge conditioning tanks are also in this building. The sludge is brought back from the mixing tanks to these batch tanks. This stage is where the characteristics of the wastes are eliminated with the addition of lime. This is also a polymer break-up stage.

The sludge is then transferred to the filter presses, which process approximately 7,000 gallons of waste an hour. The filter cake drops out into a dump trailer. Clean Harbors generates a load and a half per operating day. A silo of dry lime was located just outside the door of the filter press area.

The tour continued to the Administration building, where I proceeded to review some records. From this building, we went across the street to the CHESI - TF. At this address, we observed the truck maintenance shop, the drum hub, and the field services storage and maintenance building.

In the drum hub, it did not appear as though any waste was being generated. The containers of waste in the area were to be transferred to another truck for shipment to another Clean Harbors facility. Each of the containers that could be seen had labels and appeared to be in good condition (See Appendix A: Photograph 3).

In the truck maintenance shop, three 55-gallon drums of waste were positioned against one wall. One container was labeled as "Waste Oil," and the second drum held "Ignitable Waste Liquids." (See Appendix A: Photograph 4). The third drum contained "Aerosols for Incineration" and was marked with a start date of accumulation from 11/13/13 (See Appendix A: Photograph 5). Both the second and third drums were labeled as "Hazardous Waste". Universal waste was also stored in this area (See Appendix A: Photograph 6). Four boxes of used lamps were labeled as "Universal Waste," were closed, and were marked with a start date of accumulation from 11/13/2013. Three 5-gallon buckets of batteries were also labeled as "Universal Waste."

According to Ms. Sevy, the maintenance crew will also work at the CHESI – WTP site. Maintenance wastes that are generated at CHESI – WTP are stored in the maintenance area at the CHESI – TF. These wastes are sent off-site under the CHESI – WTP EPA ID number. The labels on the containers of hazardous waste identified in the above paragraph were marked with the CHESI – WTP ID number.

In the Field Services storage building, a 55-gallon drum and 330-gallon tote were labeled as "Used Oil" (See Appendix A: Photograph 7). Another 55-gallon drum was labeled as "Waste Coolant" (See Appendix A: Photograph 8). Oil filters are put out to drain into a secondary containment pallet, which was not labeled (See Appendix A: Photograph 9). A third 55-gallon drum in the area held spent antifreeze and was labeled as "Anti-Freeze" (See Appendix A: Photograph 10). It was not known at the time of the inspection if the used coolant and antifreeze were to be recycled or managed as wastes.

The tour ended at the outdoor storage pad for outgoing containers of waste at the CHESI - WTP. Twenty-one pallets of rejected wastes in containers of various shapes and sizes were stored in this area at the time of the inspection (See Appendix A: Photographs 11 and 12). According to facility personnel, Clean Harbors can hold on to these rejected containers for a maximum of 60 days before preparing a new manifest and signing as the offerer of the wastes either to an alternate disposal facility or back to the generator. Each of the containers appeared to be in good condition and was labeled.

### **Records and Emergency Preparedness Review**

Contingency Plan: The contingency plan for the CHESI – WTP was last revised on 7/18/12. The plan included a list of emergency coordinators with phone numbers and addresses. The plan also included an emergency equipment list complete with descriptions, capabilities and locations. Evacuation procedures are delineated, as are arrangements with emergency response authorities including police and fire departments, hospitals, and the CHESI emergency field services team. The plan is distributed to all emergency response authorities.

Personnel Training Requirements: The CHESI training records are maintained in an on-line database. An 8-hour annual RCRA class and a separate training class for the contingency plan is provided for employees whose job descriptions include hazardous waste management. The most recent classes were presented in May, 2013, for RCRA and August, 2013, for the contingency plan.

Manifests: Hazardous waste manifests for wastes that are generated on-site, as well as for those wastes that are rejected from customers were reviewed. The manifests appeared complete and are kept on-site for at least three years.

Waste Profiles: I reviewed profiles for the following waste streams:

- Filter cake generated from the presses at the end of the wastewater treatment process. The analytical results for this material indicate non-hazardous waste.
- Waste generated from the Tank 5 cleanout – Because the material in this tank was generated from treating F039 listed waste, it carried several waste codes including F039.
- Used oil – the profile, which is a corporate profile, meaning that the same profile is used for every CHESI facility, indicates that there are zero total halogens in this waste stream. The oil is sent for recycling.
- Antifreeze – the profile for this material indicates generator knowledge as the basis for waste determination. Antifreeze may become contaminated with heavy metals during use and may become hazardous. Generator knowledge does not account for the contaminants that may be introduced to the antifreeze during use. No analysis data was available for this waste stream.

Weekly Inspections of Container Storage: Inspections of the 90-day pad are conducted at least weekly at CHESI-WTP. Records are kept for at least three years.

### Closing Conference

The following items were discussed with Clean Harbors' personnel at the close of the inspection:

- CBI – A determination was made that none of the information discussed or documents taken by Ms. Whitney during the inspection would be considered CBI.
- Weekly inspections
- Labeling of used oil, coolant, and antifreeze containers
- Satellite accumulation requirements
- Future closing of the drum hub.

### Appendices

Appendix A: Photograph Log

Appendix B: Checklists

Appendix C: Documents received from CHESI during the inspection.

Appendix D: Email correspondence between Susan Sevy of CHESI and Brenda Whitney of EPA. Includes attachments.





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# Appendix A

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## Photograph Log

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**Inspection Date:**

December 11, 2013

**Facility Name and ID Number:**

CHESI - WTP

EPA ID: OHD000724153

CHESI – TF

EPA ID: MAD039322250

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Camera Used:**

Nikon Cool Pix P4 VR

Serial Number: 30530701

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Photograph 1 – This photograph is oriented on its left side. This flammable proof cabinet was located in the laboratory at CHESI-WTP. The containers held a combination of usable materials and waste. Not all of the containers were clearly marked as one or the other.



Photograph 2 – The used oil tank at CHESI – WTP was labeled as "Used Oil."

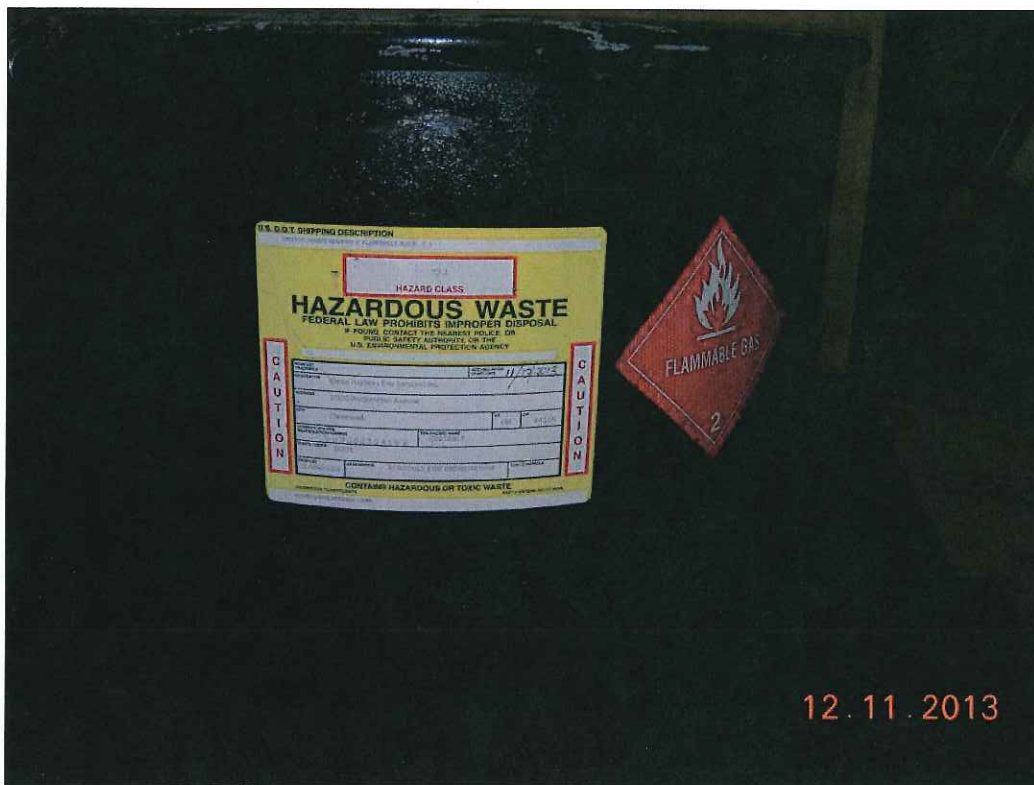




Photograph 3 –



Photograph 4 – These containers were located in a plant maintenance area at CHESI – TF. These wastes may have been generated at CHESI – WTP. The right-most drum held “Waste Ignitable Liquids.” The left-most container held used oil and was labeled as “Waste Oil.”



Photograph 5 – This container was located next to the drums identified in Photograph 4, above. This container held “Aerosols for Incineration.” This waste may have been generated at CHES1 – WTP.



Photograph 6 – Universal waste was stored in the same area as the wastes identified in photographs 4 and 5. The containers of lamps and batteries were closed and labeled.





Photograph 7 – This tote of used oil was located in the Field Services portion of the CHESI – TF. The tote was labeled as “Used Oil Only.”



Photograph 8 – This 55-gallon drum of coolant was located in the Field Services portion of the CHESI – TF and was labeled as “Waste Coolant.”





Photograph 9 – Oil filters were draining into a containment pallet in the Field Services portion of the CHESI - TF. The pallet was not labeled with the words "Used Oil."



Photograph 10 – A drum of waste antifreeze was located in the Field Services portion of CHESI – TF. The container was marked with the word "Anti-Freeze."





Photograph 11 – These containers have been rejected for treatment at the CHESI-WTP, and are being temporarily stored on a concrete pad outside of the plant to be shipped to an alternate designated facility or back to the generator.



Photograph 12 – See caption for Photograph 11.





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# Appendix B

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## Checklists

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**Inspection Date:**  
December 11, 2013

**Facility Name and ID Number:**  
CHESI - WTP  
EPA ID: OHD000724153

CHESI – TF  
EPA ID: MAD039322250

**Inspector:**  
Brenda Whitney  
Compliance Section 2  
RCRA Branch  
Land and Chemicals Division

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**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
*NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] <i>PLANT MAINTENANCE WASTE</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

*NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.*

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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*NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).*

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	N/A		
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

11.	Does the generator export hazardous waste? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>HOWEVER - THE BURTON, MI CHESI FACILITY IS PRIMARY EXPORTER AND MAINTAINS RECORDS</i>				
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>MANIFEST REQUIREMENTS</b>		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]		
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does the generator provide refresher training to employees during each period from January 1 <sup>st</sup> to December 31 <sup>st</sup> and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:			
	a. Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
29.	Does the plan describe the following:			
	a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

#### EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

#### PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

- St. Vincent Hospital

- Field Service Department for spills contractor

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# **SATELLITE ACCUMULATION AREA REQUIREMENTS**

43.	Does the generator ensure that satellite accumulation area(s):					
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>		
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>		
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>		
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>		
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>		
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>		
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>		
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>		

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

## **USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
47.	Are hazardous wastes stored in containers which are:				
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
b.	In good condition? [3745-66-71]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	



52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.				
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]				
<b>PRE-TRANSPORT REQUIREMENTS</b> <i>According To Facility Reps</i>				
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Continue with the generator LDR requirements on the next page.				

## GENERATOR LDR REQUIREMENTS

NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.

## GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If "Yes" see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
i	Applicable HW codes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
ii	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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		[3745-270-07(A)(2)]		
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>				
11.	Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
<b>PROHIBITED DILUTION</b>				
12.	Is the HW treated by burning?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
If "No" go to #15.				
13.	Is the HW a metal-bearing HW?		Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <b>one</b> of the following conditions apply. [3745-270-03(c)]		
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Was the HW treated by wastewater treatment?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: If "Yes", HW is improperly being treated by dilution.				
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				



**USED OIL INSPECTION CHECKLIST****GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

**NOTE:** 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at [https://www.comapps.ohio.gov/sfm/fire\\_apps/bustr/bustr/PublicInquiry.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/PublicInquiry.asp) to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: [https://www.comapps.ohio.gov/sfm/fire\\_apps/bustr/bustr/SearchByCounty.asp](https://www.comapps.ohio.gov/sfm/fire_apps/bustr/bustr/SearchByCounty.asp).

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks, or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).				
<b>GENERATOR TRANSPORTATION</b>				
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] <i>Environmental Specialists, Inc.</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).				
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>				
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.				



CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET		
CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste. SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month. LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month. NOTE: To convert from gallons to pounds: Amount in gallons x 8.345 = Amounts in pounds.		
Safety Equipment Used:		
<b>WASTE EVALUATION</b>		
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] <u>ANTIFREEZE</u>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>GENERATOR CLASSIFICATION</b>		
2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.		
<b>OFF-SITE SHIPMENT OF HAZARDOUS WASTE</b>		
3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] <u>COMBINE WASTES WITH WASTEWATER</u>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>TREATMENT OF HAZARDOUS WASTE</b> <u>TREATMENT PLANT WASTE</u>		
4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Complete appropriate checklist for each unit.		
NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.		
NOTE: If waste is treated to meet LDRs, use LDR checklist.		
<b>MIX HAZARDOUS WASTE WITH USED OIL</b>		
5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>



# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

## PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

## WASTE MANAGEMENT AND LABELING/MARKING

### UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

### UNIVERSAL WASTE LAMPS

8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

**NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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## ACCUMULATION TIME

11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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	handler to demonstrate) [3745-273-15(B)]	
NOTE: Accumulation is defined as date generated or date received from another handler.		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below: START DATES AND MANIFEST FOR PREVIOUS SHIPMENT	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EMPLOYEE TRAINING</b>		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] NOT OBSERVED	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one</u> of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>EXPORTS</b>		
NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]		
NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.		

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USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS			
NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.			
<b>PROHIBITIONS</b>			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
<b>GENERATOR STANDARDS</b>			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or <u>containers</u> or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] <u>Pallet and coolant</u>		Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>ON-SITE BURNING IN SPACE HEATER</b>			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

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b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

#### GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

#### COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

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# Appendix C

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## Documents received during the Inspection:

- Training syllabus and records
- Contingency Plan (sans attachments)
- Manifests for Tank 5 cleanout
- Manifest examples of partial and full load rejections
- Weekly inspection record example for 90-day pad dated 12/3/13
- Profile for wastewater treatment filter press solids
- Blank truck tracking form

---

**Inspection Date:**  
December 11, 2013

**Facility Name and ID Number:**  
CHESI - WTP  
EPA ID: OHD000724153

CHESI - TF  
EPA ID: MAD039322250

---



TRAINING SYLLABUS  
AND  
RECORDS





1. Introduction
2. Regulation Overview
  - a. RCRA History
  - b. RCRA Subtitles
  - c. Goals of RCRA
  - d. Hazardous Waste Regulations
    - i. Federal Register
    - ii. Code of Federal Regulations (CFR)
      1. Parts 260-265, 268 & 273
    - iii. Universal Waste
3. Identifying Hazardous Waste
  - a. Definition
  - b. Exclusions
  - c. Listed Hazardous Waste
    - i. "F" List - Wastes from non-specific sources
    - ii. "K" List - Wastes from specific sources
    - iii. "U" List - Wastes which were never used
    - iv. "P" List - Acutely Hazardous Waste
  - d. Characteristics of Hazardous Waste
    - i. D001 - Ignitable
    - ii. D002 - Corrosive
    - iii. D003 - Reactive
    - iv. D004-D043 - Toxic
4. Generator Status & Requirements
  - a. Generator Classifications
  - b. Quantity Limitations
    - i. CESQG
    - ii. SQG
    - iii. LQG
    - iv. TSDF
  - c. Generator Requirements
5. Accumulating and Storing Hazardous Waste
  - a. Container Selection
    - i. Transportable
    - ii. Tanks
  - b. Satellite Accumulation
  - c. Satellite Container Marking
  - d. Drum Transportation Requirements
  - e. Storage Areas
  - f. Hazardous Waste Markings for Transportation
  - g. Segregating Incompatible Hazardous Waste
  - h. Potentially Incompatible Wastes
6. Manifesting & Land-Ban Restrictions
  - a. Hazardous Waste Manifest
    - i. General Info



- ii. Filling Out the Manifest
    - iii. Routing of Manifest Copies
    - iv. Record Keeping and Reporting
  - b. Land Disposal Restrictions (LDR)
    - i. Overview
    - ii. Determining if a Waste is Restricted from Land Disposal
    - iii. Generator Requirements
    - iv. Appendices
- 7. Waste Minimization
  - a. Source Reduction
  - b. Approaches and Techniques
  - c. Incentives and Benefits
  - d. Examples
- 8. Contingency Planning and Emergency Response
  - a. Content of a Contingency Plan
  - b. Emergency Procedures
  - c. Actions During an Emergency
  - d. Emergency Equipment and Systems
  - e. Resuming Operations
  - f. Documentation and Reports
  - g. Identification of Hazardous Materials
    - i. MSDS
    - ii. NFPA labels
    - iii. HMIS labels
- 9. Cleveland Facility Contingency Plan and Emergency Procedures
  - a. General Info
  - b. Emergency Coordinators\*
  - c. Implementation
    - i. Fires/Explosions
    - ii. Spills or Materials Release
    - iii. Floods
  - d. Emergency Response Procedures
    - i. Notification to Federal, State and Local Officials
    - ii. Identification of Hazardous Materials
    - iii. Assessment
    - iv. Control Procedures
      - 1. Fire/Explosion
      - 2. Release to Air, Soil or Surface Water
      - 3. Equipment Failure or Power Outages
    - v. Prevention of Recurrence or Spread of Fires, Explosions or Releases
    - vi. Storage and Treatment of Released Material
    - vii. Incompatible Waste
    - viii. Post Emergency Equipment Maintenance
    - ix. Container Spills and Leaks





- x. Tank System Spills and Leaks
- e. Emergency Equipment\*\*\*
- f. Coordination Agreement Requirements\*\*
- g. Evacuation Plan
  - i. Signals
  - ii. Routes
  - iii. Post Evacuation Personnel Verification
- h. Required Reports
- i. Employee Training
- j. Fire Extinguisher Training
- k. Employee Review
- l. Tables G-1\*, G-2\*\*, G-3\*\*\*
- m. Appendix G-1, Chemical Storage Site Plan
- n. Appendix G-2, Emergency Equipment Key and Evacuation Routes



[New Window](#) [Customize Page](#) [http](#)**Review Session Summary**

**Course Code:** ET3050 **Course Name:** Annual RCRA Training  
**Session Number:** 00010668 **Status:** Complete  
**Start Date:** 08/29/2013 **End Date:** 08/29/2013  
**Language:** **Facility:** Clean Harbors of Cleveland

**Session Summary**[Customize](#) [Find](#) [View All](#) [First](#) [1-6 of 6](#) [Last](#)

Employee ID	Name	Status	Grade
026281	Luz E Marrero	Completed	
1213	Susan J Sevy	Completed	
1912	Alberto A Hernandez	Completed	
3368	Oren B Hargrove	Completed	
3731	Michael T Skidmore	Completed	
4551	Jose A Castaneda	Completed	

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**Course Code:** ET3050 **Course Name:** Annual RCRA Training  
**Session Number:** 00010682 **Status:** Complete  
**Start Date:** 09/23/2013 **End Date:** 09/23/2013  
**Language:** **Facility:** Clean Harbors of Cleveland

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Employee ID	Name	Status	Grade
0046	Dominic E Okon	Completed	
0084	Jaime Cotto	Completed	
023311	Demarcus G Dues	Completed	
6016	Santiago Benavides	Completed	

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**Course Code:** ET3050 **Course Name:** Annual RCRA Training  
**Session Number:** 00010671 **Status:** Complete  
**Start Date:** 08/27/2013 **End Date:** 08/27/2013  
**Language:** **Facility:** Clean Harbors of Cleveland

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Employee ID	Name	Status	Grade
0085	David M Cicerchi	Completed	
022142	Edward L Riley Sr	Completed	
2913	Frank G Hegarty	Completed	
4583	Jeffrey L Jones	Completed	

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**Course Code:** ET3050      **Course Name:** Annual RCRA Training  
**Session Number:** 00010669      **Status:** Complete  
**Start Date:** 08/28/2013      **End Date:** 08/28/2013  
**Language:**      **Facility:** Clean Harbors of Cleveland

**Session Summary**Customize | Find | View All |   First  1-5 of 5  Last

Employee ID	Name	Status	Grade
027928	Clifford M Stanley	Completed	
1913	Sylvester F Young	Completed	
4281	John D Merth	Completed	
4368	Tracy A Balcer	Completed	
7702	John R Farris	Completed	

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# CONTINGENCY PLAN





**Contingency Plan  
And  
Emergency Procedures**

**For:**

**Clean Harbors Environmental Services, Inc.  
2900 Rockefeller Ave.  
Cleveland, Ohio 44115**



CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

G-1 GENERAL INFORMATION

Clean Harbors Environmental Services, Inc. (CHESI) is a wastewater treatment facility which treats hazardous and non-hazardous aqueous waste. The name, facility address, EPA 10 Number, and owner/operator of the facility is:

Facility Name: Clean Harbors Environmental Services, Inc.  
Facility Address: 2900 Rockefeller Avenue  
Cleveland, Ohio 44115  
EPA ID Number: OHD000724153  
Owner/Operator: Clean Harbors Environmental Services, Inc.  
2900 Rockefeller Avenue  
Cleveland, Ohio 44115

CHESI treats aqueous-based waste streams in an onsite waste water treatment system. A site plan for the facility is presented in Appendix G-1.

CHESI has developed this Contingency Plan ("the Plan") in accordance with the requirements of OAC 3745-52-34(A){4}. The purpose of the Plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned, sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters. The actions described in this Plan must be implemented immediately whenever such releases could threaten human health or the environment. The Plan will be reviewed, and immediately amended, if necessary, whenever:

- \* The facility permit is revised;
- \* The Plan fails in an emergency;
- ▼ CHESI implements a design, construction, operational, or maintenance change which materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the nature of the required response;
- ▼ The list of Emergency Coordinators changes; or
- ▼ The list of emergency equipment changes.

Up-to-date copies of the revised Plan will maintained on file at the facility and distributed to the Emergency Coordinators identified in Section G-2 and all emergency response agencies identified in Section G-6 of the Plan.



## G-2 EMERGENCY COORDINATORS [OAC 3745-65-52 (DI. OAC 3745-65-55)]

The CHESI personnel listed in Table G-1 have been designated to act as Emergency Coordinators.

At least one of the Emergency coordinators will, at all times, be either on the facility premises or on call and available to respond to an emergency by reaching the facility within a short period of time. The Emergency Coordinators are responsible for coordinating all emergency response measures. The Emergency Coordinators are thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, the Emergency Coordinators have the authority to commit the resources needed to carry out the Contingency Plan.

If none of the designated Emergency Coordinators are on the premises, the on duty Supervisor will be responsible for contacting the Emergency Coordinator. The Supervisor will assume the duties of the Emergency Coordinator until such time as one of the designated Emergency Coordinator has arrived at the scene.

## G-3 IMPLEMENTATION [OAC 3745-65-56]

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. This Contingency Plan will be implemented in the following instances:

### 1. Fire and/or Explosion:

- a) A fire which could cause the release of toxic fumes.
- b) A fire which could spread and ignite materials at other locations onsite or could cause heat induced explosions.
- c) A fire which could possibly spread to offsite areas.
- d) Use of water and/or chemical fire suppressant which could result in contaminated run-off.
- e) An explosion which could cause a safety hazard because of flying fragments or shock waves.
- f) An explosion which could ignite other hazardous waste at the facility.

### 2. Spills or Material Release:

- a) A spill or leak which could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- b) A spill or leak which could cause the release of toxic liquids or fumes.
- c) A spill which could result in onsite soil contamination.





- d) A spill which cannot be contained onsite could result in offsite soil contamination and/or ground or surface water contamination.
- e) A spill which could enter the sewer systems.

3. Floods:

- a) A flood which could result in surface water contamination.
- b) A flood which could spread hazardous waste constituents causing onsite and offsite soil and groundwater contamination.
- c) A flood which could disrupt activities at the facility and endanger health and safety.

#### G-4 EMERGENCY RESPONSE PROCEDURES

##### G-4(a) Notification to Federal, State, and Local Officials

###### m General

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator shall immediately:

- 1. Notify affected facility personnel verbally or by using two way radios;
- 2. Activate internal facility alarms/paging systems, if necessary, and;
- 3. Contact federal/state/local agencies having designated response roles for assistance, if necessary.

If the Emergency Coordinator's assessment of the situation determines that the facility has experienced, or is likely to experience, a release, fire, or explosion which could threaten public health, safety, or welfare, the environment, or that external emergency response assistance is required, the Emergency Coordinator shall immediately notify the Cleveland Fire and Police Departments, the Ohio EPA Emergency Response Team and Cuyahoga County Emergency Management.

\* Cleveland Fire Department:



- \* Cleveland Police Department: 911
- \* Ohio EPA Emergency Response Team: (216) 621-1234 (800) 282-9378
- \* Cuyahoga County Emergency Management: (216) 771-1365

The Cleveland Fire Department shall function at the primary response agency in all emergency situations. The Emergency Coordinator shall be available to assist the Cleveland Fire Department and other state/local officials in deciding whether local areas should be evacuated.



— The reporting requirements for spills, leaks, and/or releases at the facility are governed by two separate regulatory programs:

1. CERCLA National Contingency Plan 140 CFR 300)
2. SARA Emergency Planning and Notification (40 CFR 355).

In accordance with the terms of the National Contingency Plan (NCP), 40 CFR Part 302, CHESI will notify USEPA and Ohio EPA and undertake appropriate response actions to any reportable release or threat of release of oil or hazardous materials to the environment.

A release shall be considered "reportable", and the Contingency Plan shall be enacted, if the amount of the release exceeds the Reportable Quantity (RQ) for that material as listed in Table 302.4, List of Hazardous Substances and Reportable Quantities (40 CFR Part 302). A "reportable" release will be reported to the Ohio EPA and the USEPA National Response Center (NRC) as soon as possible, but not more than twenty-four (24) hours after obtaining knowledge of a release or threat of a release. The release shall also be reported to the Cleveland Fire Department, and the Ohio EPA Emergency Response Team:

- **USEPA National Response Center:** 1800) 424-8802

Notification under SARA regulations is required when: 1) a CERCLA "hazardous substance" [40 CFR Part 302, Table 302.4] or a SARA "extremely hazardous substance" [40 CFR Part 355, Appendix A] is released in an amount in excess of the RQ; **AND** 2) when the release threatens the environment or public beyond the boundaries of the site. For any release which is reportable under SARA, a verbal notification will be made to the State Emergency Response Commission (SERC) and the Local Emergency Response Planning Commission (LERPC) in addition to the USEPA National Response Center. The Ohio EPA serves as the SERC; the Cuyahoga County Emergency Management functions as the LEPC.

## (ii) Content of Notification

In general, when notifying external emergency response authorities, the caller shall provide the following information to the extent known at the time of the report:

The name and telephone number of the individual making the report

- The name and address of the facility;
- The time, type (e.g., release, fire), and duration of the incident/release;
- The chemical name(s) and quantity of material(s) involved;
- \* The extent of injuries, if any;

The potential hazards to public health, safety, or welfare, or the environment outside the facility.





In addition, if the release is being reported in accordance with SARA requirements, the following information is to also be provided to the extent known at the time of the report:

- \* Any known or anticipated acute or chronic health risks associated with the emergency, and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- \* Proper precautions to take as a result of the release, including evacuation; and
- \* The names and telephone number of the person or persons to be contacted for further information

Within fifteen (15) days of any release requiring the implementation of the Plan, CHESI shall submit to Ohio EPA a written follow-up report that will include:

1. The name, address, and telephone number of the owner or operator;
2. The name, address, and telephone number of the facility;
3. The date, time, and type of incident (e.g., fire, explosion);
4. The name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to public health, safety, welfare, or the environment, as applicable;
7. The estimated quantity and the disposition of recovered material that resulted from the incident;
8. Proposed measures to prevent similar incidents in the future.
9. Any additional information as the OEPA may require.

For release incidents reported under SARA, CHESI shall, as soon as practicable after the release (but no more than fifteen [15] days later), submit a written follow-up report to the LEPC and SERC. The report shall include items 1 through 9 above, and:

10. A description of the actions taken to respond to and contain the release;
11. Any known or anticipated acute or chronic health risks associated with the release;
12. Where appropriate, advice regarding medical attention necessary for exposed individuals.



#### G-4b Identification of Hazardous Materials

Whenever there is a release, fire, or explosion, the Emergency Coordinator will immediately take all appropriate steps to identify the character, source, amount, and extent of any released material. The determination may be made by visual observation, discussions with other CHESI personnel, a review of facility records and/or manifests, or by chemical analysis.

#### G-4c Assessment

The Emergency Coordinator is responsible for assessing any possible hazards to human health or the environment which may result from the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, the effects of any hazardous surface water run-offs from chemical agents and/or water used to control fire or heat-induced explosions).

In assessing the toxic or hazardous nature of the material(s) involved in the incident, the Emergency Coordinator may rely on operational experience and/or technical information provided by Material Safety Data Sheets (MSDS's), manufacturer's literature, or standard reference books such as CRC handbooks or the NIOSH Pocket Guide to Chemical Hazards. The Clean Harbors Corporate Health and Safety staff is also available for consultation on a 24-hour basis. A general description of the anticipated hazards from the waste material and raw treatment chemicals stored/used at the facility is presented in Appendix G-1.

#### G-4d Control Procedures

Any employee who observes, discovers or otherwise detects an emergency situation involving fire, explosion or release is to follow the general emergency response procedures:

1. Immediately notify the Emergency Coordinator.
2. Alert other personnel in adjacent areas to potential hazards.
3. Render assistance to personnel that may be involved in the emergency and remove them from further exposure or injury.
4. The Emergency Coordinator will, depending on the magnitude of the situation, call for local emergency assistance.
5. If evacuation of the facility is required, all plant operation::; are to immediately cease. All personnel are to quickly and calmly exit their workplaces, evacuate the facility via the prescribed evacuation routes, and assemble in the pre-designated emergency assembly area outside the main entrance to the facility.



6. Facility personnel should only attempt to handle fires or other emergencies in their early stages (i.e., incipient stage). Under no circumstance, however, should any employee attempt to handle an emergency situation alone.

#### G-4d(1) Fire and/or Explosion

In the event of a fire or explosion, the following response procedures shall be followed:

1. The individual discovering the fire is to immediately contact the Emergency Coordinator.
2. Area personnel may attempt to contain small fires using the portable fire extinguishers located throughout the facility without taking undue risk of personal injury. Facility personnel should only attempt to handle fires in their early or incipient stages.
3. If outside fire fighting assistance is required, the Emergency Coordinator shall immediately notify the Cleveland Fire Department.

#### G-4 {2} Release to Air, Soil, or Surface Water

In the event of a release of hazardous waste to the air, soil or surface water (other than from a fire or explosion) the following procedures shall be followed:

1. The individual discovering the release is to immediately contact the Emergency Coordinator.
2. Area personnel shall attempt to contain the release without taking undue risk of personal injury.
3. The Emergency Coordinator shall direct all spill cleanup/containment actions.
4. Absorbent material (i.e., Speedi-Dri) is available in the facility for use in containing and cleaning up spills.
5. All contaminated material (i.e., spill debris, spent absorbents, etc.) shall be removed and deposited into drums or bulk roll-off containers for disposal at an approved offsite disposal facility.
6. Large-quantity liquid spills shall be collected using portable pumps or vacuum tankers at the direction of the Emergency Coordinator. Special precautions shall be taken to ensure that collected liquids are compatible with pumping equipment and will not cause any adverse reactions. Collected liquids will be pumped into the bulk transport vehicles. Collected solids will be drummed or placed in a roll-off container for disposal at an approved offsite facility.



#### G-4d(3) Equipment Failure or Power Outages

The procedures to be followed in the event of an equipment failure or a facility-wide power outage include:

1. Immediate shut-down of all related operations;
2. Replace or repair affected equipment;
3. Re-start of equipment/operations only at the direction of the Emergency Coordinator.

Note that operations which are not affected by a power outage may continue to operate at the discretion of the Emergency Coordinator.

#### G-4e Prevention of Recurrence of Spread of Fires, Explosions or Releases

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other areas of the facility. These measures include where applicable: stopping material transfer operations; containing and collecting released wastes and contaminated run-off streams; and removing or isolating containers.

If the facility halts operations in response to a fire, explosion or release, the Emergency Coordinator shall monitor for leaks, pressure build-ups, or ruptures in valves, pipes, or other equipment.

#### G-4f Storage and Treatment of Released Material

Immediately after an emergency, the Emergency Coordinator must provide for the treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other material that results from a release, fire, or explosion at the facility. CHESI will manage all recovered material as hazardous waste unless analytical results indicate otherwise, and will assume the responsibilities of being the waste generator for all materials shipped offsite for treatment and/or disposal.

#### G 4g Incompatible Waste

No waste which may be incompatible with the released material is to be treated, stored, or disposed of until cleanup procedures are completed and waste compatibility has been determined according to in-house waste codes and verified by sampling and analysis protocol in the facility's Waste Analysis Plan (WAPI).

#### G-4h Post Emergency Equipment Maintenance

Immediately following an emergency at the facility, the Emergency Coordinator will provide for the decontamination and/or replacement of all emergency equipment utilized during the response. All emergency equipment listed in the Contingency Plan shall be inspected, cleaned, and maintenance performed before normal operations are resumed.





#### G-4i Container Spills and Leaks

In the event of leak or spill involving containers, the following response measures shall be taken:

1. If a container is found to be leaking, the contents of the container shall be immediately transferred to another compatible container, or the leaking container shall be placed into an approved salvage or over-pack drum.
2. Spilled or leaking waste shall be collected and removed using absorbents or other means such as shovels, brooms, pumps, etc. All collected materials and spill residues shall be containerized and managed as a hazardous waste unless analytical results indicate otherwise.
3. In the event that a container inside a lab pack is cracked or broken, the container shall be removed from the lab pack and re-packed. Any packing material which becomes contaminated as the result of a cracked/leaking container shall be containerized and managed as a hazardous waste unless analytical results indicate otherwise. Any other container inside the lab pack which becomes contaminated by the spilled material will be decontaminated (i.e., wiped off) and placed into another compatible lab pack.

#### G-4j Tank System Spills and Leaks

##### G-4j(1) Tank System Spills and Leakage

In the event of leak or spill involving the tanks or containment systems at the facility, the following response measures shall be taken:

1. The flow of liquid into the tank system will be immediately halted by shutting down the pumping system. If necessary, the waste liquids in the leaking tank will be pumped into an alternative tank to prevent further flow.
2. Within 24 hours of detecting a leak in a tank system, CHESI will remove as much of the waste as is necessary to prevent further release of waste and to allow inspection and repair of the tank system to be performed.
3. Any material released into a tank containment system will, within 24 hours of the release and to the extent practicable, be pumped back into an alternative tank. Absorbent materials will be available to pick up non-pumpable waste or residue.
4. Any tank failure or release from a tank or containment system which results in a release of hazardous waste into the environment will be verbally reported to the Agency within twenty-four (24) hours. A written follow-up report will be submitted to the Agency within fifteen (15) days of the detection of the release or leak.



5. All tank repair activities shall comply with the repair requirements of the CHESI Consent Decree. Major repairs will be certified as complete by an OH registered professional engineer (PE).

#### G-5 EMERGENCY EQUIPMENT [ 724.152(e)]

A list of the emergency and safety equipment maintained at the facility, as well as a site map showing the locations of each piece of emergency equipment is presented in:

Appendix G-2: Clean Harbors Environmental Services, Inc.,  
Emergency & Safety Equipment Location Plan.

The capabilities of the emergency equipment available onsite are summarized in Table G-3.

In addition to the equipment described in Appendix G-2, the General Manager, Laboratory Manager, Operations Manager, and each Plant Operator or Maintenance personnel is equipped with or has access to the following safety equipment:

- 1 pair of safety glasses with sideshields
- 1 pair of chemical goggles
- 1 cartridge respirator
- 1 pair of combination cartridges {dusts/acid gas/org. vapors}
- chemical splash suits {i.e., coated Tyveks, etc.}
- 5 sets of work uniforms
- 1 hard-hat w/safety shield
- PVC gloves
- rubber boots

All CHESI laboratory personnel are equipped with the following personal safety equipment:

- 1 pair safety glasses with sideshields
- 1 cartridge respirator
- laboratory coats

Additionally disposable plastic {nitrile} gloves and hard hats are available in the laboratory for common use.

#### G-6 COORDINATION AGREEMENT REQUIREMENTS [OAC 3745-65-521Cil

In accordance with OAC 3745-65-52(C), CHESI will distribute copies of this Contingency Plan to the emergency response organizations noted in Table G-2. In addition, CHESI will, as changes in the Plan warrant, sponsor informational meetings at the facility to provide the agencies with the opportunity to tour the facility and discuss emergency response procedures.

Copies of all correspondence related to emergency response coordination agreements between CHESI and the above-noted agencies will be maintained on file at the facility. CHESI will document the refusal of any of these agencies to participate in the emergency response coordination effort.



## G-7. EVACUATION PLAN

### G-7a. Evacuation Plan

The Emergency Coordinator is the sole CHESI representative who has the authority to direct personnel to evacuate the facility. Note that the use of the emergency alarm system requires employees to exit their workplace immediately after stopping all plant functions whose continued operation would threaten safety in and around the facility. Employees responsible for stopping plant functions are as follows:

1. Reactor operators must stop all chemical additions.
2. Truck pad operators must stop all pumps on the truck pad and close all truck external valves.
3. CTU operator must shut off treatment.
4. Filter press operator must stop sludge feed pump into filter press, and stop sludge addition into any tank being filled (ARs and sludge feed tanks).

Employees must then proceed directly to the emergency assembly point outside the main entrance gate to the facility. Employees not responsible for stopping the above functions must proceed immediately to the main entrance gate to the facility.

### G7b. Evacuation Signal(s)

The Emergency Coordinator will issue a verbal command or sound the internal fire alarm to notify facility personnel of the decision to evacuate. Prior to evacuation, the supervisors must account for all personnel from their respective work areas. Supervisors are trained and will assist with the evacuation of plant personnel. No plant personnel will remain behind to operate critical plant functions.

### G7c. Evacuation Routes

Primary evacuation routes from each of the operational and support areas are shown in the "Emergency Evacuation Plan" presented in Appendix G 2. After exiting the workplace, personnel will assemble outside the main facility entrance to await further instructions from the Emergency Coordinator. An annual evacuation drill is performed to ensure personnel are familiar with the evacuation route in the event of an authentic emergency.

### G-7d. Post Evacuation Personnel Verification

The Emergency Coordinator will account for all personnel after evacuation. A head count will be performed by the Emergency Coordinator after evacuation.

## G-8. REQUIRED REPORTS

The Emergency Coordinator will document in the facility's operating record the time, date and details of any incident that requires notification to any external emergency response agency.



Within fifteen (15) days after any such incident, a written report of the incident will be submitted to the Ohio EPA. The report will include the information described previously in Section GA(a)(ii). Operations following an emergency will not resume without the approval of the Emergency Coordinator.

#### G-9. EMPLOYEE TRAINING

Employees are required to review this plan at the time of its development, whenever the plan is changed, or when employee responsibilities or designated actions under the plan change. All employees must review the plan at time of hire and at least annually thereafter. Employees desiring clarification of the plan or their role in the plan will contact the Emergency Coordinators listed in Table G-1.

#### G-10. FIRE EXTINGUISHER TRAINING

All employees, with the exception of administrative and clerical staff, will be trained in the use of portable fire extinguishers for use in fighting incipient stage fires. This training will be done at initial hire and annually thereafter.

#### G-11. EMPLOYEE REVIEW

This plan is available at all times for employee review in the Compliance Manager's Office.





MANIFESTS FOR  
TANK 5 CLEANOUT  
EXPORTED TO CANADA



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OH D000724153	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 006835407 FLE				
5. Generator's Name and Mailing Address Clean Harbors Env Services Inc 2900 Rockefeller Avenue Cleveland, OH 44115 Generator's Phone: (216) 429-2402			Generator's Site Address (if different than mailing address) SAME						
6. Transporter 1 Company Name Price Trucking			U.S. EPA ID Number NYD046765574						
7. Transporter 2 Company Name			U.S. EPA ID Number						
8. Designated Facility Name and Site Address Clean Harbors Canada Inc 4090 Teller Road RR#1 Cuyahoga Falls, OH 44815 Facility Phone: (330) 864-1021			U.S. EPA ID Number MIR000035204						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
	x	NA3082. HAZARDOUS WASTE, LIQUID N.O.S. (ACETONE, METHYLENE CHLORIDE), 9, PG III	001	CM	00018	T	D001	D002	D003
							D004	D005	D006
14. Special Handling Instructions and Additional Information 1. LB-CLIXEB ERG#171 CHESI, EPA ID NO. MIRO00014530, VS ACTING AS THE PRIMARY EXPORTER ON BEHALF OF THE GENERATOR. 10E#6695/SE/13 CN# RT04342-2 POC#6682/3E/13 25137 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
TRANSPORTER INTL	Generator's/Officer's Printed/Typed Name Mike Hammer		Signature Mike Hammer		Month Day Year 9/23/13				
	16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit Port Huron MI		Date leaving U.S. 9/25/13				
	17. Transporter Acknowledgment of Receipt of Materials Transporter: Monte Miles		Signature Monte Miles		Month Day Year 09/24/13				
	Transporter 2 Printed/Typed Name		Signature		Month Day Year				
	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number		U.S. EPA ID Number						
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) Facility's Phone:		Signature Mike Brain		Month Day Year 09/24/13				
	18c. Signature of Alternate Facility (or Generator)								
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
	1. H132		2.		3.		4.		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Mike Brain								



# MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

This Movement document/manifest conforms to all federal and provincial transport and environmental legislation.  
Ce document de mouvement/manifeste est conforme aux législations fédérale et provinciale sur l'environnement et le transport.

1.13-CLLXER



RT04342-2-3

RT04342-2

Movement Document / Manifest Reference No.  
N° de référence du document de mouvement/manifeste

SC PPW 8/6/2013  
CT5042360

<b>A Generator / consigneur</b> <b>Producteur / expéditeur</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>MI R 0 0 0 0 1 4 3 3 0</b>				<b>B Carrier</b> <b>Transporteur</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>7803-SV857F</b>				Reference No. of other movement document(s)/manifest(s) used / N° de référence des autres documents de mouvement/manifestes utilisés <b>0068354077LE</b>			
Company name / Nom de l'entreprise <b>Clean Harbors Environmental Services Inc.</b>				Company name / Nom de l'entreprise <b>Price Tracking</b>				<b>C Receiver / consignee</b> <b>Réceptionnaire / destinataire</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>A031806</b>			
Mailing address / Adresse postale <b>4475 Dost Highway</b> <b>East Windsor</b> <b>MI 48329</b> Tel. No. / N° de tél. <b>519 713-2746</b>				Mailing address / Adresse postale <b>77 Hudson Street</b> <b>East Windsor</b> <b>MI 48329</b> Tel. No. / N° de tél. <b>519 713-2746</b>				Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire est le même qu'à la Partie A <input checked="" type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous			
Shipping site address / Adresse de lieu de l'expédition <b>4475 Dost Highway</b> <b>East Windsor</b> <b>MI 48329</b>				Shipping site address / Adresse de lieu de l'expédition <b>77 Hudson Street</b> <b>East Windsor</b> <b>MI 48329</b>				Company name / Nom de l'entreprise <b>CLEAN HARBORS CANADA INC.</b> Mailing address / Adresse postale <b>P.O. #1, 4090 TELFER ROAD</b> <b>CORUNNA, ONTARIO N0N 1G0</b> City / Ville <b>CORUNNA</b> Province <b>ON</b> Postal code / Code postal <b>N0N 1G0</b> E-mail / Courriel électronique <b>519-884-1021</b>			
Intended Receiver / consignee Réceptionnaire / destinataire prévu <b>Clean Harbors Canada Inc.</b> Mailing address / Adresse postale <b>4090 Telfer Road #241</b> <b>Corunna</b> <b>ON</b> Tel. No. / N° de tél. <b>519 884-1021</b>				Intended Receiver / consignee Réceptionnaire / destinataire prévu <b>Clean Harbors Canada Inc.</b> Mailing address / Adresse postale <b>4090 Telfer Road #241</b> <b>Corunna</b> <b>ON</b> Tel. No. / N° de tél. <b>519 884-1021</b>				Date received / Date de réception Year / Année <b>13</b> Month / Mois <b>09</b> Day / Jour <b>06</b> Time / Heure <b>7:00</b> <input type="checkbox"/> P.M.			
Port of entry Point d'entrée <b>SAABIA, ON</b>				Port of exit Point de sortie International use only <b>SAABIA, ON</b>				Carrier Certification: I certify that I have received waste or recyclable material from the generator / consigneur for delivery to the receiver / consignee as set out in Part A and that the information contained in Part B is complete and correct. Attestation du transporteur: J'atteste avoir reçu les déchets ou matières recyclables du producteur / expéditeur en vue de leur livraison au réceptionnaire / destinataire, tels qu'ils figurent à la partie A et que les renseignements inscrits à la partie B sont exacts et complets.			
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Maude Miles</b>				Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Maude Miles</b>				Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>1309215</b>			
Year / Année <b>13</b> Month / Mois <b>09</b> Day / Jour <b>21</b>				Signature <b>Maude Miles</b>				Quantity received Quantité reçue <b>7050 KG</b>			
Units L or / ou Kg <b>KG</b>				Packaging/Contenant No. / N° <b>1</b>				Comments Commentaires <b>YES</b>			
Phys. state État phys. <b>41</b>				Handling Code de manutention <b>03</b>				Shipment / Envoi Accepted / Refused <b>YES</b>			
Decant Pack. / Veh. <b>NO</b>				Decant Pack. / Veh. <b>NO</b>				If handling code "Other" (specify) Si code de manutention « autre » (spécifier)			
Notice No. N° de notification <b>331446</b>				Notice Line No. N° de ligne de la notification <b>46(46)</b>				Shipment Envoi <b>1</b>			
D or R code Code E ou R <b>008</b>				C code Code C <b>C42</b>				Basel Annex VIII or OECD Code Annexe VIII de Bâle ou Code OCDE <b>A3190</b>			
H code Code H <b>X12</b>				Y code Code Y <b>X42</b>				National code in country of / Code du pays <b>USA</b>			
Export Exportation <b>USA</b>				Import Importation <b>USA</b>				Customs code(s) Code(s) de douanes <b>3823.51.00.00</b>			
International use only											
Generator / consigneur certification: I certify that the information contained in Part A is correct and complete. Attestation du producteur / expéditeur: J'atteste que tous les renseignements à la partie A sont exacts et complets.											
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Annapa Schmitt</b>											
Signature <b>Annapa Schmitt</b>											
Tel. No. / N° de tél. <b>519 713-2746</b>											
Date shipped / Date d'expédition Year / Année <b>13</b> Month / Mois <b>09</b> Day / Jour <b>25</b>											
Time / Heure <b>1:15</b> <input type="checkbox"/> P.M.											
Scheduled arrival date / Date d'arrivée prévue Year / Année <b>13</b> Month / Mois <b>11</b> Day / Jour <b>25</b>											





Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Sep 24, 2013

MANIFEST INFORMATION

Generator : Clean Harbors Env Services Inc

Address: 2900 Rockefeller Avenue  
Cleveland, OH 44115

EPA ID #: OHD000724153

Manifest Tracking Info.

000835407 FLE

Sales Order No: CL8042380

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	LB-CLLXEB	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code	EPA Waste SubCategory
D004	Toxicity Characteristic for Arsenic
D005	Toxicity Characteristic for Barium
D006	Toxicity characteristic for Cadmium
D007	Toxicity Characteristic for Chromium
D008	Toxicity Characteristic for Lead
D009	Low Mercury, not RMERC Residues
D010	Toxicity Characteristic for Selenium
D011	Toxicity Characteristic for Silver
F025	Light Ends Subcategory
K006	Hydrated Subcategory
K069	Low Lead Subcategory
K071	Non-wastewaters, not residues from RMERC
K106	Non-wastewater, Low Mercury, not residues from RMERC
P047	4,6-dinitro-o-cresol salts
P065	Non-wastewaters, not incinerator or RMERC residues
P092	Non-wastewater, not incinerator residue or RMERC residue
U151	Low Mercury, non-wastewater not RMERC residues







## Notification Form

Page : 2 of 2

Printed Date : Sep 24, 2013

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## Certification

**Applies to  
Manifest Line  
Items**

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1

Waste analysis data, where available, is attached.

**Signature :**

data, where available, is attached.

Ray Enders  
Conference Guard

**Print Name**

Lib E Martin  
9/24/13

**Date :**



# Clean Harbors Manifest Addendum

Page:1 of 4

<b>Generator ID Number:</b>		<b>Sales Order Number:</b>
OHD000724153		CL8042380
Clean Harbors Env Services Inc 2900 Rockefeller Avenue Cleveland, OH44115		
Line #	Profile No.	Waste Codes
1.	LB-CLLXEB	D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018 D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035 D036 D037 D038 D039 D040 D041 D042 D043 F001 F002 F003 F004 F005 F006 F007 F008 F009 F010 F011 F012 F019 F024 F025 F034 F035 F037 F038 F039 K001 K002 K003 K004 K005 K006 K007 K008 K009 K010 K011 K013 K014 K015 K016 K017 K018 K019 K020 K021 K022 K023 K024 K025 K026 K027 K028 K029 K030 K031 K032 K033 K034 K035 K036 K037 K038 K039 K040 K041 K042 K043 K044 K045 K046 K047 K048 K049 K050 K051 K052 K060 K061 K062 K064 K065 K066 K069 K071 K073 K083 K084 K085 K086 K087 K088 K090 K091 K093 K094 K095 K096 K097 K098 K099 K100 K101 K102 K103 K104 K105 K106 K107 K108 K109 K110 K111 K112 K113 K114 K115 K116 K117 K118 K123 K124



## Clean Harbors Manifest Addendum

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K132 K136 K156  
K157 K158 K159  
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P003 P004 P005  
P006 P007 P008  
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## Clean Harbors Manifest Addendum

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## Clean Harbors Manifest Addendum

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U279 U280 U328  
U353 U359 U364  
U367 U372 U373  
U387 U389 U394  
U395 U404 U409  
U410 U411

CH Container #

Customer Container #



UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <b>OH D000724153</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800) 483-3718</b>	4. Manifest Tracking Number <b>006835409 FLE</b>					
5. Generator's Name and Mailing Address <b>Clean Harbors Env Services Inc 2500 Rockefeller Avenue Cleveland, OH 44115 Generator's Phone: (216) 428-2402</b>				Generator's Site Address (if different than mailing address) <b>SAME</b>						
6. Transporter 1 Company Name <b>Price Trucking</b>				U.S. EPA ID Number <b>NY D046765574</b>						
7. Transporter 2 Company Name				U.S. EPA ID Number						
8. Designated Facility Name and Site Address <b>Clean Harbors Canada Inc 4090 Teller Road RR#1 Corunna, ON N0N 1G0 Facility's Phone: (519) 864-1021</b>				U.S. EPA ID Number <b>MIR000035204</b>						
9a. HM <b>X</b>	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) <b>HAZARDOUS WASTE, LIQUID, N.O.S. (ACETONE METHYLENE CHLORIDE), 9, PG III</b>			10. Containers No. <b>001</b> Type <b>CM</b>		11. Total Quantity <b>0.0013</b>	12. Unit Wt./Vol. <b>T</b>	13. Waste Codes <b>D004 D005 D006 D007 D008 D009</b>		
14. Special Handling Instructions and Additional Information <b>1. LB-CLENEE ERG#171</b> <b>CHES, EPA ID NO. MIR000014530, IS ACTING AS THE PRIMARY EXPORTER ON BEHALF OF THE GENERATOR.</b> <b>AOC#6695/3E/13 CN# RT043448</b>										
15. GENERATOR/SOFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Officer's Printed/Typed Name <b>Mike Harned</b> Signature <b>Mike Harned</b> Month Day Year <b>9/27/13</b>										
16. International Shipments <input checked="" type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: <b>Port Huron, MI</b> Transporter signature (for exports only): <b>Monte Miles</b> Date leaving U.S.: <b>9/30/13</b>										
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <b>Monte Miles</b> Signature <b>Monte Miles</b> Month Day Year <b>9/30/13</b> Transporter 2 Printed/Typed Name Signature Month Day Year										
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number										
18b. Alternate Facility (or Generator) Facility's Phone: Month Day Year										
18c. Signature of Alternate Facility (or Generator) Month Day Year										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. <b>H132</b> 2. 3. 4.										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name <b>Nicole Brin</b> Signature <b>Nicole Brin</b> Month Day Year <b>11/01/13</b>										



# MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

This Movement document/manifest conforms to all federal and provincial transport and environmental legislation. Ce document de mouvement/manifeste est conforme aux législations fédérale et provinciale sur l'environnement et le transport.

1-18-CLERK



RT04344-8-3

RT04344-8

Movement Document / Manifest Reference No.  
N° de référence du document de mouvement/manifeste

SC PW 8/6/2013  
CT 8058375

<b>A Generator / consigneur</b> <b>Producteur / expéditeur</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>MIR 000014530</b>		<b>B Carrier</b> <b>Transporteur</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>7808-SV8277</b>		Reference No. of other movement document(s) used / N° de référence des autres documents de mouvement/manifestes utilisés <b>016235401116</b>	
Company name / Nom de l'entreprise <b>Clean Harbors Environmental Services Inc.</b> Mailing address / Adresse postale <b>64475 Doer Highway</b> City / Ville <b>Sutton</b> Province <b>MT</b> Postal code / Code postal <b>48528</b>		Company name / Nom de l'entreprise <b>Price Swelling</b> Mailing address / Adresse postale <b>77 Beacon Street</b> City / Ville <b>Sutton</b> Province <b>MT</b> Postal code / Code postal <b>48528</b>		<b>C Receiver / consignee</b> <b>Réceptionnaire / destinataire</b> Registration No. / Provincial ID No. N° d'immatriculation - d'id. provincial <b>A0318006</b>	
Shipping site address / Adresse de lieu de l'expédition <b>64475 Doer Highway</b> City / Ville <b>Sutton</b> Province <b>MT</b> Postal code / Code postal <b>48528</b>		Vehicle / Véhicule Trailer - Rail car No. 1 1 <sup>re</sup> remorque - wagon <b>1458070</b> Registration No. / N° d'immatriculation <b>716 822-1414</b> Prov. 24 <b>Me.</b>		Receiver / consignee information same as in Part A Les renseignements du réceptionnaire / destinataire est le même qu'à la Partie A <input checked="" type="checkbox"/> Yes / Oui <input type="checkbox"/> No, complete the box below / Non, remplir la case ci-dessous	
Intended Receiver / consignee Réceptionnaire / destinataire prévu <b>Clean Harbors Canada Inc.</b> Mailing address / Adresse postale <b>4090 Telfer Road RR#1</b> City / Ville <b>Corunna</b> Province <b>ON</b> Postal code / Code postal <b>N0N 1G0</b>		Port of entry / Point d'entrée <b>Canada, ON</b> Port of exit / Point de sortie <b>Canada, ON</b>		Company name / Nom de l'entreprise <b>CLEAN HARBORS CANADA INC.</b> Mailing address / Adresse postale <b>P.R. #1, 4090 TELFER ROAD</b> City / Ville <b>CORUNNA, ONTARIO</b> Province <b>ON</b> Postal code / Code postal <b>N0N 1G0</b>	
Receiving site address / Adresse de lieu de destination <b>Same</b>		Date received / Date de réception <b>13 10 01</b> Time / Heure <b>7:10 PM</b>		If waste or recyclable material to be transferred, specify intended company name / Si les déchets ou matières recyclables doivent être transférés, préciser le nom du destinataire <b>None</b>	
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Monte Miles</b> Tel. No. / N° de tél. <b>716 822-1414</b>		Signature <b>Monte Miles</b>		Registration No. / Provincial ID No. N° d'immatriculation / d'id. provincial <b>716 822-1414</b>	
Year / Année <b>11</b> Month / Mois <b>10</b> Day / Jour <b>01</b>		Year / Année <b>11</b> Month / Mois <b>10</b> Day / Jour <b>30</b>		Signature <b>Monte Miles</b>	
Class / Classe Sub. class(es) / Classe(s) sub. <b>914</b>		UN No. N°NU <b>3082</b>		Packing / risk gr. Gr. d'emballage/ de risque <b>15329</b>	
Quantity shipped Quantité expédiée <b>15329</b>		Units L or / ou Kg Unités <b>kg</b>		Packaging/Contenant No. / N° <b>01</b>	
Phys. state Etat phys. <b>3</b>		Quantity received Quantité reçue <b>6390 kg</b>		Units L or / ou Kg Unités <b>kg</b>	
Comments Commentaires <b>variance explanation</b>		Handling Code / Code de manutention <b>03</b>		Shipment / Envoi Accepted / Refusé <b>YES</b>	
Decont. Cont. <b>NO</b>		Decont. Cont. <b>NO</b>		Decont. Cont. <b>NO</b>	
Notice No. N° de notification <b>331446</b>		Notice Line No. N° de ligne de la notification <b>2</b>		Shipment Envoi <b>000</b>	
D or R code Code D ou R <b>008</b>		C code Code C <b>042</b>		Basel Annex VII or OECD Code Annexe VII de Bâle ou Code OCDE <b>A3150</b>	
H code Code H <b>012</b>		Y code Code Y <b>002</b>		National code in country of / Code du pays <b>USA</b>	
Export Exportation <b>USA</b>		Import Importation <b>USA</b>		Customs code(s) Code(s) de douanes <b>3425-61-00-00</b>	
International use only					
Generator / consigneur certification: I certify that the information contained in Part A is correct and complete. Attestation du producteur / expéditeur: J'atteste que tous les renseignements à la partie A sont exacts et complets.					
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Monte Miles</b> Signature <b>Monte Miles</b> Tel. No. / N° de tél. <b>716 822-1414</b>					
Receiver / consignee certification: I certify that the information contained in Part C is correct and complete. Attestation du réceptionnaire / destinataire: J'atteste que tous les renseignements à la partie C sont exacts et complets.					
Name of authorized person (print) Nom de l'agent autorisé (caractères d'imprimerie) <b>Nicole Brain</b> Signature <b>Nicole Brain</b> Tel. No. / N° de tél. <b>519-311-2001</b>					
Special handling / Manutention spéciale <input type="checkbox"/> Attached / Ci-joint: <input checked="" type="checkbox"/> As follows / Ci-dessous: <b>See attached variance explanation</b>					
Date shipped / Date d'expédition Year / Année <b>11</b> Month / Mois <b>10</b> Day / Jour <b>30</b>					
Time / Heure <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM <b>7:10 PM</b>					
Scheduled arrival date / Date d'arrivée prévue Year / Année <b>11</b> Month / Mois <b>10</b> Day / Jour <b>30</b>					





Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Sep 25, 2013

Generator : Clean Harbors Env Services Inc Address: 2900 Rockefeller Avenue Cleveland, OH 44115  EPA ID #: OHD000724153	Manifest Tracking Info. <i>000838404AE</i>  Sales Order No: CL8058326
---	--

LINE ITEM INFORMATION				
Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	LB-CLLXEB	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D004			Toxicity Characteristic for Arsenic	
D005			Toxicity Characteristic for Barium	
D006			Toxicity characteristic for Cadmium	
D007			Toxicity Characteristic for Chromium	
D008			Toxicity Characteristic for Lead	
D009			Low Mercury, not RMERC Residues	
D010			Toxicity Characteristic for Selenium	
D011			Toxicity Characteristic for Silver	
F025			Light Ends Subcategory	
K006			Hydrated Subcategory	
K069			Low Lead Subcategory	
K071			Non-wastewaters, not residues from RMERC	
K106			Non-wastewater, Low Mercury, not residues from RMERC	
P047			4,6-dinitro-o-cresol salts	
P065			Non-wastewaters, not incinerator or RMERC residues	
P092			Non-wastewater, not incinerator residue or RMERC residue	
U151			Low Mercury, non-wastewater not RMERC residues	







Land Disposal Restriction  
Notification Form

Page : 2 of 2

Printed Date : Sep 25, 2013

D012D013D014D015D016D017D018D019D020D021D022D023D024D025D026D027D028D029D030D031D032D033D034D035D036D037D038D039D040D041D042D043D044D045D046D047D048D049D050D051D052D053D054D055D056D057D058D059D060D061D062D063D064D065D066D067D068D069D070D071D072D073D074D075D076D077D078D079D080D081D082D083D084D085D086D087D088D089D090D091D092D093D094D095D096D097D098D099D100D101D102D103D104D105D106D107D108D109D110D111D112D113D114D115D116D117D118D119D120D121D122D123D124D125D126D127D128D129D130D131D132D133D134D135D136D137D138D139D140D141D142D143D144D145D146D147D148D149D150D151D152D153D154D155D156D157D158D159D160D161D162D163D164D165D166D167D168D169D170D171D172D173D174D175D176D177D178D179D180D181D182D183D184D185D186D187D188D189D190D191D192D193D194D195D196D197D198D199D200D201D202D203D204D205D206D207D208D209D210D211D212D213D214D215D216D217D218D219D220D221D222D223D224D225D226D227D228D229D230D231D232D233D234D235D236D237D238D239D240D241D242D243D244D245D246D247D248D249D250D251D252D253D254D255D256D257D258D259D260D261D262D263D264D265D266D267D268D269D270D271D272D273D274D275D276D277D278D279D280D281D282D283D284D285D286D287D288D289D290D291D292D293D294D295D296D297D298D299D300D301D302D303D304D305D306D307D308D309D310D311D312D313D314D315D316D317D318D319D320D321D322D323D324D325D326D327D328D329D330D331D332D333D334D335D336D337D338D339D340D341D342D343D344D345D346D347D348D349D350D351D352D353D354D355D356D357D358D359D360D361D362D363D364D365D366D367D368D369D370D371D372D373D374D375D376D377D378D379D380D381D382D383D384D385D386D387D388D389D390D391D392D393D394D395D396D397D398D399D400D401D402D403D404D405D406D407D408D409D410D411

NONE

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature :

*[Handwritten Signature]*

Print Name

*W E Manner*

Title :

*Compliance Board*

Date :

*9/25/13*



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

CL8347094

SC PPW 8/6/2013

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OHD000724153	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 006768342 FLE				
5. Generator's Name and Mailing Address Clean Harbors Env Services Inc 2900 Rockefeller Avenue Cleveland, OH 44115 Generator's Phone: (216) 429-2402			Generator's Site Address (if different than mailing address) SAME						
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc			U.S. EPA ID Number MAD039322250						
7. Transporter 2 Company Name			U.S. EPA ID Number						
8. Designated Facility Name and Site Address Clean Harbors Canada Inc 4090 Telfer Road RR#1 Corunna, ON N0N 1G0 Facility's Phone: (519) 864-1021			U.S. EPA ID Number MIR000035204						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
			No.	Type					
	1. UN3082, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES, LIQUID, N.O.S., (ACETONE, METHYLENE CHLORIDE), 9, PG III		001	CM	00018	T	D004	D005	D006
							D007	D008	D009
14. Special Handling Instructions and Additional Information: Box# VB 21342 AOC#6695/3E/13 CN# LP46410-4 1. UN-CLXDRB ERG#171 CHESI, EPA ID NO. MIR000014530, IS ACTING AS THE PRIMARY EXPORTER ON BEHALF OF THE GENERATOR.									
15. GENERATOR/SUPPLIER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/packaged, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 362.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator/Supplier's Printed/Typed Name M. F. Romero			Signature [Signature]			Month Day Year 10 18 13			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Port Huron, Michigan			Date leaving U.S.: November 15, 2013			
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Car Vander Heydon			Signature [Signature]			Month Day Year 11 12 13			
Transporter 2 Printed/Typed Name			Signature			Month Day Year			
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number									
18b. Alternate Facility (or Generator) Facility's Phone: Month Day Year									
19. Signature of Alternate Facility (or Generator) Month Day Year									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H332 2. 3. 4.									
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a. Printed/Typed Name: Linda Hayward Signature: [Signature] Month Day Year: 11 13 13									



This Movement document/manifest conforms to all federal and provincial transport and environmental legislation.  
Ce document de mouvement/manifeste est conforme aux législations fédérale et provinciale sur l'environnement et le transport.

Box VB21342

BC PRW 8/6/2013  
CL 147084

Movement Document / Manifest Reference No.  
N° de référence du document de mouvement/manifeste

MOE 04-1917 (07/07)

Instructions for completion and distribution on reverse / Instructions pour compléter et distribuer au verso

**Copy / Copie 3 (yellow / jaune)**





Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Oct 30, 2013

Generator : Clean Harbors Env Services Inc Address: 2900 Rockefeller Avenue Cleveland, OH 44115 EPA ID #: OHD000724153	Manifest Tracking Info: <i>00 4768342 FLE</i> Sales Order No: CL8347094
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LINE ITEM INFORMATION				
Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	LB-CLLXEBB	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D004			Toxicity Characteristic for Arsenic	
D005			Toxicity Characteristic for Barium	
D006			Toxicity characteristic for Cadmium	
D007			Toxicity Characteristic for Chromium	
D008			Toxicity Characteristic for Lead	
D009			Low Mercury, not RMERC Residues	
D010			Toxicity Characteristic for Selenium	
D011			Toxicity Characteristic for Silver	
F025			Light Ends Subcategory	
K006			Anhydrous Subcategory	
K069			Low Lead Subcategory	
K071			Non-wastewaters, not residues from RMERC	
K106			Non-wastewater, Low Mercury, not residues from RMERC	
P047			4,6-dinitro-o-cresol	
P065			Non-wastewaters, not incinerator or RMERC residues	
P092			Non-wastewater, not incinerator residue or RMERC residue	
U151			Low Mercury, non-wastewater not RMERC residues	







Land Disposal Restriction  
Notification Form

Page : 2 of 2

Printed Date : Oct 30, 2013

D012D013D014D015D016D017D018D019D020D021D022D023D024D025D026D027D028D029D030D031D032D033D034D035D036D037D038D039D040D041D042D043D044D045D046D047D048D049D050D051D052D053D054D055D056D057D058D059D060D061D062D063D064D065D066D067D068D069D070D071D072D073D074D075D076D077D078D079D080D081D082D083D084D085D086D087D088D089D090D091D092D093D094D095D096D097D098D099D100D101D102D103D104D105D106D107D108D109D110D111D112D113D114D115D116D117D118D119D120D121D122D123D124D125D126D127D128D129D130D131D132D133D134D135D136D137D138D139D140D141D142D143D144D145D146D147D148D149D150D151D152D153D154D155D156D157D158D159D160D161D162D163D164D165D166D167D168D169D170D171D172D173D174D175D176D177D178D179D180D181D182D183D184D185D186D187D188D189D190D191D192D193D194D195D196D197D198D199D200D201D202D203D204D205D206D207D208D209D210D211D212D213D214D215D216D217D218D219D220D221D222D223D224D225D226D227D228D229D230D231D232D233D234D235D236D237D238D239D240D241D242D243D244D245D246D247D248D249D250D251D252D253D254D255D256D257D258D259D260D261D262D263D264D265D266D267D268D269D270D271D272D273D274D275D276D277D278D279D280D281D282D283D284D285D286D287D288D289D290D291D292D293D294D295D296D297D298D299D300D301D302D303D304D305D306D307D308D309D310D311D312D313D314D315D316D317D318D319D320D321D322D323D324D325D326D327D328D329D330D331D332D333D334D335D336D337D338D339D340D341D342D343D344D345D346D347D348D349D350D351D352D353D354D355D356D357D358D359D360D361D362D363D364D365D366D367D368D369D370D371D372D373D374D375D376D377D378D379D380D381D382D383D384D385D386D387D388D389D390D391D392D393D394D395D396D397D398D399D400D401D402D403D404D405D406D407D408D409D410D411

NONE

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature :

*Rita E. Manner*

Print Name

*Rita E. Manner*

Title :

*Compliance Officer*

Date :

*10/30/13*



MANIFEST EXAMPLES  
OF PARTIAL AND FULL  
LOAD REJECTIONS

MANIFEST # 006745647 FLE

# 006745645 FLE



D37393438

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		Generator ID Number <b>PA082038480</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>800-483-3718</b>	4. Manifest Tracking Number <b>006745647 FLE</b>	
Generator's Name and Mailing Address <b>General Electric company 207 N. THOMAS AVE PO BOX 250 Sayre, PA 18840</b>				Generator's Site Address (if different than mailing address)		
Generator's Phone: <b>570-888-9623</b>						
6. Transporter 1 Company Name <b>Clean Harbors Environmental Services Inc.</b>				U.S. EPA ID Number <b>PA039322250</b>		
7. Transporter 2 Company Name <b>Trail Transport Inc.</b>				U.S. EPA ID Number <b>0140981588791</b>		
8. Designated Facility Name and Site Address <b>Spring Grove Resource Recovery Inc. 4879 Spring Grove Ave Cincinnati, OH 45232</b>				U.S. EPA ID Number <b>OH0008146629</b>		
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.
		1. <b>LITHIUM, CORROSIVE LIQUIDS, N.O.S., (Sodium Silicate), 8, PG III</b>		20 DF	1100 G	CRC4 MATF
		2.				
		3.				
		4.				
14. Special Handling Instructions and Additional Information <b>1. CH670055</b> <b>#330659915 → 6015</b>						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name <b>W. E. Manno</b>				Signature <b>W. E. Manno</b>		Month Day Year <b>18 15 13</b>
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <b>Clean Harbors Environmental Services Inc.</b>				Signature <b>[Signature]</b>		Month Day Year <b>8 13 13</b>
Transporter 2 Printed/Typed Name <b>Edwin Sokol</b>				Signature <b>[Signature]</b>		Month Day Year <b>8 13 13</b>
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number: <b>006745647 FLE</b>						
18b. Alternate Facility (for Generator)						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. <b>H141</b>		2.		3.		4.
20. Designated Facility Owner/Operator Certification of receipt of hazardous materials covered by the manifest except as noted in Part 18a						
Printed/Typed Name <b>[Signature]</b>				Signature <b>[Signature]</b>		Month Day Year <b>08 12 13</b>



#6225

**D37292430**

SC PFW 3/3/2011

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Please print or type. (Form designed for use on effluents (12-pitch) typewriters.)		Page 1 of 2		3. Emergency Response Phone <b>(800) 483-3718</b>		4. Manifest Tracking Number <b>006615347 FLE</b>	
<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> WASTE MANIFEST <b>PAD082038480</b>		1. Generator ID Number		Generator's Site Address (if different than mailing address)			
5. Generator's Name and Mailing Address <b>General Electric Company 207 N Thomas Avenue PO Box 250 Savoy, PA 18840</b>				SAME			
Generator's Phone: <b>(670) 888-0823</b>				U.S. EPA ID Number			
6. Transporter 1 Company Name <b>Clean Harbors Environmental Services Inc</b>				<b>MAD039322250</b>			
Transporter 2 Company Name <b>Clean Harbors Environmental Services Inc</b>				U.S. EPA ID Number <b>MAD039322250</b>			
8. Designated Facility Name and Site Address <b>Clean Harbors Env Services Inc 2900 Rockefeller Avenue Cleveland, OH 44115</b>				U.S. EPA ID Number <b>OHD000724153</b>			
Facility's Phone: <b>(216) 420-2403</b>							
9a. HTM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.
						13. Waste Codes	
<b>X</b>	<b>1. UN1824, WASTE SODIUM HYDROXIDE SOLUTION, 8, PG II</b>	<b>023</b>	<b>DF</b>	<b>11,000</b>	<b>P</b>	<b>D002</b>	
<b>X</b>	<b>2. UN1760, CORROSIVE LIQUIDS, N.O.S., (SODIUM SILICATE), 8, PG III</b>	<b>024</b>	<b>DF</b>	<b>10,500</b>	<b>P</b>		
	<b>3.</b>						
	<b>4.</b>						
14. Special Handling Instructions and Additional Information <b>1. CH70008-1 23K55 ERG1154</b> <b>2. CH99412 24K55 ERG1154</b> <div style="float: right; text-align: right;"><b>NJDEP # 12589</b></div>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name <b>Andrew Kabes</b>				Signature <i>[Signature]</i>		Month Day Year <b>7/15/13</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.				Port of entry/exit: Date leaving U.S.:			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>TOM CLINE</b>				Signature <i>[Signature]</i>		Month Day Year <b>7/15/13</b>	
Transporter 2 Printed/Typed Name <b>Gary Bailef</b>				Signature <i>[Signature]</i>		Month Day Year <b>7/15/13</b>	
18. Discrepancy 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input checked="" type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection <b>Does not comply with wt</b> Manifest Reference Number: <b>006615347</b> U.S. EPA ID Number: <b>OHD000724153</b>							
18b. Alternate Facility (for Generator) <b>2079 4th Ave NE, Ashtabula, OH 44004</b> Facility's Phone: <b>(440) 293-2332</b> U.S. EPA ID Number: <b>OHD000724153</b>							
18c. Signature of Alternate Facility (for Generator) <div style="float: right; text-align: right;">Month Day Year <b>7/15/13</b></div>							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>H070</b>		2. <b>H070</b>		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest (except as noted in item 18a)							
Printed/Typed Name <b>Tracy Balcer</b>				Signature <i>[Signature]</i>		Month Day Year <b>7/16/13</b>	

EPA Form 8700-22 (Rev. 8-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

EPA Form 8700-22 (Rev. 8-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

**Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.**







Land Disposal Restriction  
Notification Form

Page : 1 of 1

Printed Date : Jul 12, 2013

MANIFEST INFORMATION

Generator : General Electric Company	Manifest Tracking Info.
Address: 207 N Thomas Avenue PO Box 250 Sayre, PA 18840	006615347FLE
EPA ID #: PAD082038480	Sales Order No: D37393638

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CH70008-1	WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code D002			EPA Waste SubCategory Corrosive Characteristic	

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

2.

Waste analysis data, where available, is attached.

Signature :

Andrew F. Kabes

Print Name

Andrew Kabes

Title :

Carman

Date :

7-15-13



EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)







DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.





D27 394617

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CTD082546814</b>	2. Page 1 of 1	3. Emergency Response Phone <b>800-483-</b>	4. Manifest Tracking Number <b>006745645 FLE</b>		
5. Generator's Name and Mailing Address <b>Connecticut Hypodermics</b> <b>514 Main St</b> <b>Yalesville, CT 06492</b>			Generator's Site Address (if different than mailing address)				
Generator's Phone: <b>203-265-4681</b>							
6. Transporter 1 Company Name <b>Clean Harbors Environmental Services Inc.</b>			U.S. EPA ID Number <b>MA003932725C</b>				
7. Transporter 2 Company Name <b>Triad Transport Inc.</b>			U.S. EPA ID Number <b>060981588791</b>				
8. Designated Facility Name and Site Address <b>Spring Grove Resource Recovery Inc.</b> <b>4874 Spring Grove Ave</b> <b>Cincinnati, OH 45232</b>			U.S. EPA ID Number <b>104DDC0816629</b>				
Facility's Phone: <b>513-681-6242</b>							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN3098, waste oxidizing liquid, corrosive, N.O.S. (sodium nitrate, sodium nitrite), 5.1, (8), P011	001	DF	55	G	D001 D002 D003
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information <b>1. Ctl 671610</b> <b># 33295110</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name <b>W E Mariano</b>		Signature <b>W E Mariano</b>		Month Day Year <b>8 26 13</b>			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>Chris Hargrave</b>		Signature <b>Chris Hargrave</b>		Month Day Year <b>8 30 13</b>			
Transporter 2 Printed/Typed Name <b>Edwin Soler</b>		Signature <b>Edwin Soler</b>		Month Day Year <b>08 30 13</b>			
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: <b>006533991FLE</b>							
18b. Alternate Facility (or Generator)							
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>HPLU</b> 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 19a							
Printed/Typed Name <b>Nicole Eny</b>		Signature <b>Nicole Eny</b>		Month Day Year <b>09 09 13</b>			





Land Disposal Restriction  
Notification Form

Page : 1 of 1

Printed Date 8/26/13

MANIFEST INFORMATION

Generator : Connecticut Hydrochem  
Address: 519 Main St

Manifest Tracking Info.

006745045FEE

EPA ID #:

Sales Order No: 027394617

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CHC-KLD	WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D001, D002, D003			Ignitables, except High TOC Liquids	
			Corrosive Characteristic	
			Toxicity Characteristic for Chromium	

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

Waste analysis data

Signature:

Alex G. Marino

Name

Mike E. Marino

Title:

Compliance Officer

Date:

8/26/13



6229

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

D27894617

SC PPW 3/3/2011

Form Approved, OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CTD982546814</b>		2. Page 1 of 1 Emergency Response Phone <b>(800) 483-3718</b>		4. Manifest Tracking Number <b>006533991 FLE</b>	
5. Generator's Name and Mailing Address <b>Connecticut Hypodermics 519 Main St Yaleville, CT 06492</b> Generator's Phone: <b>(203) 285-4881</b> Generator's Site Address (if different than mailing address): <b>SAME</b>							
6. Transporter 1 Company Name <b>Clean Harbors Environmental Services Inc</b>						U.S. EPA ID Number <b>MAD039322260</b>	
7. Transporter 2 Company Name <b>Clean Harbors Environmental Services, Inc</b>						U.S. EPA ID Number <b>MAD039322280</b>	
8. Designated Facility Name and Site Address <b>Clean Harbors Env Services Inc 2900 Rockefeller Avenue Cleveland, OH 44115</b> Facility's Phone: <b>(216) 428-2802</b>						U.S. EPA ID Number <b>OHD000724153</b>	
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.
	1. <b>UN3092, WASTE OXIDIZING LIQUID, CORROSIVE, N.O.S., (SODIUM NITRATE, SODIUM NITRITE), S.1, (8), PG II</b>			No.	Type		
13. Waste Codes <b>D001 D002 D007</b>							
14. Special Handling Instructions and Additional Information <b>1. CH637880 ERG140</b> <b>IXSS</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Officer's Printed/Typed Name: <b>Chris Tutolo</b> Signature: <i>Chris Tutolo</i> Month: <b>17</b> Day: <b>16</b> Year: <b>13</b>							
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials Transporter signature (for exports only): _____ Transporter 1 Printed/Typed Name: <b>ERIC Judd</b> Signature: <i>E Judd</i> Month: <b>17</b> Day: <b>16</b> Year: <b>13</b> Transporter 2 Printed/Typed Name: <b>Dense Bryan as agent for</b> Signature: <i>Dense Bryan</i> Month: <b>17</b> Day: <b>16</b> Year: <b>13</b>							
18. Discrepancy 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input checked="" type="checkbox"/> Full Rejection <b>0000 n/a comply with unit</b>							
18b. Alternate Facility (or Generator) <b>Brins (Mike) Resource recovery</b> <b>6739 Spaulding Blvd And</b> <b>Cincinnati, OH 45232</b> Facility's Phone: <b>513 770 0081</b> 18c. Signature of Alternate Facility (or Generator) <i>Tracy Belar</i> Month: <b>17</b> Day: <b>16</b> Year: <b>13</b>							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. <b>H070</b> 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name: <b>Tracy Belar</b> Signature: <i>Tracy Belar</i> Month: <b>17</b> Day: <b>16</b> Year: <b>13</b>							

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.





ENVIRONMENTAL SERVICES®

MANIFEST INFORMATION

Land Disposal Restriction  
Notification Form

Page : 1 of 1

Printed Date : Jul 12, 2013

Generator : Connecticut Hypodermics				Manifest Tracking Info.	
Address: 519 Main St Yalesville, CT 06492				006533991FLE	
EPA ID #: CTD982546814				Sales Order No: D27394617	
LINE ITEM INFORMATION					
Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category	
1.	1	CH637880	WASTEWATER	2 (This is subject to LDR.)	
EPA Waste Code			EPA Waste SubCategory		
D001			Ignitables, except High TOC Liquids		
D002			Corrosive Characteristic		
D007			Toxicity Characteristic for Chromium		
Certification				Applies to Manifest Line Items	
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.				1.	
Waste analysis data, where available, is attached.					
Signature : <i>Chris Tutolo</i>		Print Name <i>CHRIS TUTOLO</i>			
Title :		Date : <i>7/16/13</i>			





UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number	22. Page	23. Manifest Tracking Number					
		CTD982540814	2 of 2	0000533991 FLE					
24. Generator's Name Connecticut Hypodermics									
25. Transporter 3 Company Name		Clean Harbor Env. Services Inc		U.S. EPA ID Number					
				MTAD 039322250					
25. Transporter 4 Company Name		Tactical Transport Inc		U.S. EPA ID Number					
				1014098155571					
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity					
				30. Unit Wt./Vol.					
				31. Waste Codes					
<div style="position: relative; height: 100px;"> <div style="position: absolute; top: 0; left: 0; width: 100%; height: 100%; border: 1px solid black; transform: rotate(45deg);"></div> <div style="position: absolute; top: 0; left: 0; width: 100%; height: 100%; border: 1px solid black; transform: rotate(-45deg);"></div> <div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%); font-size: 4em; font-weight: bold;">APO</div> </div>									
32. Special Handling Instructions and Additional Information									
33. Transporter 3 Acknowledgment of Receipt of Materials									
Printed/Typed Name		Signature		Month Day Year					
Larry Korman				12/18/13					
34. Transporter 4 Acknowledgment of Receipt of Materials									
Printed/Typed Name		Signature		Month Day Year					
L. Chum Sold Part 1287045				10/12/13					
35. Discrepancy									
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									







WEEKLY INSPECTION  
RECORD EXAMPLE FOR  
90-DAY PAD

12/3/13



WEEKLY INSPECTION FORM  
FOR 12/3/13



# CONTAINER STORAGE AREA INSPECTION FORM

FormCode COCMPFRM03

Full Name:		Date:	12/3/2013
------------	--	-------	-----------

Location:	90 Day Pad	Military Time:	
-----------	------------	----------------	--

Instructions: Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.

INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
Container Placement and Stacking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Sealing of Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Labeling of Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Pallets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Doors (indoor area)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Base / Foundation / Roof	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Berms / Racks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Debris and Refuse	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Warning Signs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		





Aisle Space	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Loading and Unloading Areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Sumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Alarm and Communication System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Storage Capacity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Bonding / Grounding	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Pumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Inventory Age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
On-Demand Work Ticket (please describe reason below)					
<div></div>					
Select Overall Assessment of Inspection Results	<div>Pass</div>				

Submit

Supervisor's Signature \_\_\_\_\_



WASTE PROFILE  
FOR  
WASTE WATER TREATMENT FILTER  
PRESS SOLIDS



WASTE PROFILE FOR  
WASTEWATER FILTER CAKE

<b>REPUBLIC</b> <small>Specialties, Inc.</small>		<b>Republic Services, Inc.</b> 18500 N. Allied Way, Phoenix, AZ 85054	
<b>SPECIAL WASTE DEPARTMENT DECISION</b>			
Waste Profile # 36841119889		Expiration Date 11/30/2013	
<b>I. Decision Request:</b>	<b>Initial</b>	<b>Recertification</b>	<b>CI Change</b>
Disposal Facility: 3684 - Countywide Landfill			
Generator Name: CLEAN HARBORS ENV SERVICES INC			
Generator Site Address: 2900 ROCKEFELLER AVE			
City: CLEVELAND	County:	State: OH	Zip:
Name of Waste: WASTEWATER FILTERCAKE SOLIDS W/O PLANT DEBRIS			
Estimated Annual Volume: 4800 Tons			

**II. Special Waste Department Decision: RI Approved LI Rejected**

Management Method(s): Landfill ☒ Solidification Bioremediation Transfer Facility

Problematic Special Waste according to Republic? Yes ☒ No

If yes, which one? ☐ \_\_\_\_\_

Approved by Special Waste Review Committee? LI Yes L. No Not Applicable

**Precautions, Conditions or Limitations on Approval**

In order to keep this file active, a representative sample of the profiled waste must be analyzed (Full TCLP & RCI) by a Certified Third Party Lab on an annual basis. The analytical along with a completed Representative Sample Certification form must be forwarded to the Special Waste Department for review and approval.

All conditions of the original profile and approval remain in effect.

Special Waste Analyst Signature: A. M. L.  
Date: 11/6/2012

Name (Printed): Anne Micci

**III. Facility Decision:**

☒ Approved ☐ Rejected

**Precautions, Conditions or Limitations on Approval**

By signing below, the General Manager or Designee agrees that a fully executed Special Waste Service Agreement is on file for this profile and that the special waste file is complete.

General Manager or Designee:  
Date: 11/6/2012

\_\_\_\_\_  
Name (Printed):



		<b>Republic Services, Inc.</b> 18500 N. Allied Way, Phoenix, AZ 85054	
<b>SPECIAL WASTE DEPARTMENT DECISION</b>			
		Waste Profile # 36841119889	Expiration Date 11/30/2013
I. Decision Request:	<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Recertification <input type="checkbox"/> Change		
Disposal Facility: 3684 - Countywide Landfill			
Generator Name: CLEAN HARBORS ENV SERVICES INC			
Generator Site Address: 2900 ROCKEFELLER AVE			
City: CLEVELAND	County:	State: OH	Zip:
Name of Waste: WASTEWATER FILTERCAKE SOLIDS W/O PLANT DEBRIS			
Estimated Annual Volume: 4800 Tons			

II. Special Waste Department Decision:    ☒ Approved    ☐ Rejected

Management Method(s):    ☒ Landfill    ☐ Solidification    ☐ Bioremediation    ☐ Transfer Facility

Problematic Special Waste according to Republic?    ☐ Yes    ☒ No

If yes, which one? \_\_\_\_\_

Approved by Special Waste Review Committee?    ☐ Yes    ☐ No    ☒ Not Applicable

#### Precautions, Conditions or Limitations on Approval

In order to keep this file active, a representative sample of the profiled waste must be analyzed (Full TCLP & RCI) by a Certified Third Party Lab on an annual basis. The analytical along with a completed Representative Sample Certification form must be forwarded to the Special Waste Department for review and approval.

All conditions of the original profile and approval remain in effect.

Special Waste Analyst Signature: \_\_\_\_\_

Date: 11/6/2012

Name (Printed): Anne Micci

III. Facility Decision:

☐ Approved    ☐ Rejected

#### Precautions, Conditions or Limitations on Approval

By signing below, the General Manager or Designee agrees that a fully executed Special Waste Service Agreement is on file for this profile and that the special waste file is complete.

General Manager or Designee: \_\_\_\_\_

Date: 11/6/2012

Name (Printed): \_\_\_\_\_







## SPECIAL WASTE PROFILE - RECERTIFICATION

Saveable fill-in form. Restricted printing until all required (yellow) fields are completed.

Disposal Facility: 3684 Countywide LF OH

Waste Profile #

36841119889

### I. Generator Information

Generator Name: Clean Harbors Env. Services, Inc.			
Generator Site Address: 2900 Rockefeller Avenue			
City: Cleveland	County: Cuyahoga	State: Ohio	Zip: 44115
State ID/Reg No:	State Approval/Waste Code:		NAICS #:
Generator Mailing Address (if different): <input type="checkbox"/> 2900 Rockefeller Avenue			
City: Cleveland	County:	State: Ohio	Zip: 44115
Generator Contact Name: Susan Sevy/Corporate Outbound			Email: sevys@cleanharbors.com
Phone Number: (216) 429-2402		Fax Number: (216) 883-1918	

### II. Waste Stream Information

Name of Waste: WWT Filter cake solids	
Check Section 1 OR Section 2 below:	
1. <input type="checkbox"/>	<p>There has been a change in the characteristics of the waste stream due to the following:</p> <ul style="list-style-type: none"><li>a. Change of a raw material used in the waste generating process.</li><li>b. Change in the waste generating process itself.</li><li>c. Change in a physical characteristic of the waste.</li><li>d. New information has been documented concerning the human health effects of exposure to the waste.</li></ul> <p>If any of these changes have occurred, a new laboratory analysis and profile sheet must be completed. Attach copies of the new chemical analysis and new Special Waste Profile with the appropriate signatures.</p>
2. <input checked="" type="checkbox"/>	<p>There have been no changes that would alter the physical characteristics of the special waste stream. Updated analytical may be required.</p>

### III. Representative Sample Certification

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		<input type="checkbox"/> No Sample Taken
		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: 10/08/12	Type of Sample: <input checked="" type="checkbox"/> COMPOSITE SAMPLE <input type="checkbox"/> GRAB SAMPLE	
Sample ID Numbers: Box139		

### IV. Certification

I hereby certify that to the best of my knowledge and belief, the information contained in the Special Waste Profile - Recertification and the information in the Original Special Waste Profile is true, complete and accurate.	
Susan Sevy	Clean Harbors Environmental Services Inc.
Authorized Representative Name And Title (Printed)	Company Name
	11/1/2012
Authorized Representative Signature	Date



# CEL Cardinal Laboratories, Inc.

2870 Salt Springs Road • Youngstown, Ohio 44509

Ph: (330) 797-8844 • Fax: (330) 797-3264 • 1-800-523-0347

E-mail: cel@cardinalenvirolabs.net

## Laboratory Analysis Report

**Client:** CLEAN HARBORS ENV. SERVICES  
Attn: DOMINIC OKON  
2900 ROCKEFELLER AVE  
CLEVELAND, OHIO 44115

**Lab Number:** 212100923  
**Sample ID:** BOX 139

**Date Sampled:** 10/8/2012  
**Time Sampled:** 8:00  
**Date Received:** 10/9/2012  
**Report Date:** 10/18/2012

**Sample Description:** GRAB  
**Sampler Name:** DOMINIC OKON  
**Sample Matrix:** Solid  
**PO#:**

**Comments:**

Analyte	Result	Unit	Detection Limit	Method	Analysis Date	Analyst
Cyanide, Reactive	BDL	mg/kg	60.3	7.3.3.2	10/18/2012	MR
Ignitability/Flashpoint	>180	°F		1010	10/12/2012	DT
Mercury	BDL	mg/L	0.008	7470	10/15/2012	TP
pH	9.79	S.U.		9045 D	10/9/2012	TP
Prep - Herbicide				3510	10/12/2012	DT
Prep - Semi Volatile				3510	10/10/2012	DT
Prep - ICP Metals				6010	10/12/2012	TP
Prep - PCB				3550	10/11/2012	JP
Prep - Pesticides				3510	10/12/2012	DT
Sulfide, Reactive	BDL	mg/kg	121	7.3.4.2	10/18/2012	MR
TCLP-Extraction (Initial pH)	9.67	S.U.		40CFR 1311	10/9/2012	TP
Arsenic	BDL	mg/L	0.500	6010	10/12/2012	TP
Barium	BDL	mg/L	0.100	6010	10/12/2012	TP
Cadmium	BDL	mg/L	0.100	6010	10/12/2012	TP
Chromium	0.146	mg/L	0.100	6010	10/12/2012	TP
Lead	BDL	mg/L	0.300	6010	10/12/2012	TP
Selenium	BDL	mg/L	0.500	6010	10/12/2012	TP
Silver	BDL	mg/L	0.100	6010	10/12/2012	TP
Pesticides				8081		
Technical Chlordane	BDL	mg/L	0.003	8081	10/15/2012	JP
Endrin	BDL	mg/L	0.001	8081	10/15/2012	JP
Heptachlor	BDL	mg/L	0.001	8081	10/15/2012	JP
Lindane	BDL	mg/L	0.001	8081	10/15/2012	JP
Methoxychlor	BDL	mg/L	0.011	8081	10/15/2012	JP
Toxaphene	BDL	mg/L	0.025	8081	10/15/2012	JP
SURROGATES				8081		
TCMX	84		35-114%	8081	10/15/2012	JP
DCBP	91		43-116%	8081	10/15/2012	JP
Polychlorinated Biphenyls (PCBs)				8082		
PCB-1016	BDL	mg/kg	1	8082	10/11/2012	JP
PCB-1221	BDL	mg/kg	2	8082	10/11/2012	JP
PCB-1232	BDL	mg/kg	1	8082	10/11/2012	JP
PCB-1242	BDL	mg/kg	1	8082	10/11/2012	JP

**Lab Number:** 212100923



# CEL Cardinal Laboratories, Inc.

PCB-1248	BDL	mg/kg	1	8082	10/11/2012	JP
PCB-1254	BDL	mg/kg	1	8082	10/11/2012	JP
PCB-1260	BDL	mg/kg	1	8082	10/11/2012	JP
SURROGATES				8082		
TCMX	42	%	23-123 %	8082	10/11/2012	JP
DCBP	44	%	30-107 %	8082	10/11/2012	JP
TCLP-Herbicides				8151		
2,4-D	BDL	mg/L	0.5	8151	10/14/2012	JP
SILVEX	BDL	mg/L	0.5	8151	10/14/2012	JP
SURROGATES				8151		
DCAA	92		35-114%	8151	10/14/2012	JP
TCLP-Volatiles (VOC)				8260/5030		
Benzene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Carbon Tetrachloride	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Chlorobenzene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Chloroform	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
1,2-Dichloroethane	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
1,1-Dichloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
2-Butanone	BDL	mg/L	0.5	8260/5030	10/12/2012	JP
Tetrachloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Trichloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Vinyl Chloride	BDL	mg/L	0.1	8260/5030	10/12/2012	JP
SURROGATES				8260/5030		
Dibromofluorobenzene	100		86-118%	8260/5030	10/12/2012	JP
Toluene-d8	97		88-110%	8260/5030	10/12/2012	JP
Bromofluorobenzene	88		86-115%	8260/5030	10/12/2012	JP
TCLP-Semi-Volatiles				8270		
Cresols	BDL	mg/L	0.2	8270	10/11/2012	JP
1,4-Dichlorobenzene	BDL	mg/L	0.04	8270	10/11/2012	JP
2,4-Dinitrotoluene	BDL	mg/L	0.04	8270	10/11/2012	JP
Hexachlorobenzene	BDL	mg/L	0.04	8270	10/11/2012	JP
Hexachlorobutadiene	BDL	mg/L	0.04	8270	10/11/2012	JP
Hexachloroethane	BDL	mg/L	0.04	8270	10/11/2012	JP
Nitrobenzene	BDL	mg/L	0.04	8270	10/11/2012	JP
Pentachlorophenol	BDL	mg/L	0.2	8270	10/11/2012	JP
Pyridine	BDL	mg/L	0.1	8270	10/11/2012	JP
2,4,5-Trichlorophenol	BDL	mg/L	0.2	8270	10/11/2012	JP
2,4,6-Trichlorophenol	BDL	mg/L	0.2	8270	10/11/2012	JP
SURROGATES				8270		
Nitrobenzene-d5	112		35-114%	8270	10/11/2012	JP
2-Fluorobiphenyl	112		43-116%	8270	10/11/2012	JP
p-Terphenyl	77		33-141%	8270	10/11/2012	JP
2-Fluorophenol	32		25-100%	8270	10/11/2012	JP
Phenol-d6	77		11-94%	8270	10/11/2012	JP
2,4,6-Tribromophenol	88		16-123%	8270	10/11/2012	JP



**CEL** Cardinal  
Laboratories, Inc.

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BDL = Below Detection Limit

Results approved by:

John Pflugh, Lab Manager

Tricia Presco, Chemist

Wendy Hanna, Customer Relations

Ohio EPA Drinking Water Certification: 1549, 898

Pennsylvania Laboratory Registration: 68-948

Lab Number: 212100923







**CARDINAL ENVIRONMENTAL LABORATORIES**  
2870 SALT SPRINGS ROAD, YOUNGSTOWN, OH 44509  
PHONE: (330) 797-8844 FAX: (330) 797-3264  
E-mail: [cel@cardinalenvirolabs.net](mailto:cel@cardinalenvirolabs.net)

Client Name Tanya Miller PO# \_\_\_\_\_  
Address 2930 Independence Av. City/State Cleveland, OH Zip 44115 Phone 216-929-2401

Company Name Clean Harbors Env. Services, Inc.  
Address 2900 Rockefeller Ave.  
City/State/Zip Cleveland, OH 44115  
Contact Person Dominic Okon  
Phone 216-429-2402 & 216 Fax OKOND@CLEANHARBORS.COM

CEL #	Customer Sample ID	Date Collected	Time Collected	Grab/Comp.	Matrix	No. Cont.	Remarks	Cont. #
21200433	BOX 139	10/8/12	84m	Grab	Sub 1			✓
Collector's Name		Relinquished By		Date/Time	Received By		Date/Time	
Dominic Okon		Dominic Okon		10/8/12	Wendy Banna		10-9-12	
Collector's Signature		Relinquished By		Date/Time	Received By		Date/Time	
[Signature]		[Signature]			[Signature]			
FOR DRINKING WATER		Witnessed By		Date/Time	Remarks			
COPY SENT TO EPA? Yes No		P.A. DEP: Yes No		Received for Laboratory By		Date/Time		
FWS ID #		D.E.P. Reportable:		Wendy Banna		10-9-12		
County		P.A. Lab Code 68-00948		Method of Submission		Cooler Temp		
		CH Pick-up						

WHITE - LAB COPY    YELLOW - REPORT    BLUE - ANALYTICAL COPY    PINK - ATTORNEY'S OFFICE



Blank Truck Tracking Sheet





Cleveland Facility  
**TRUCK TRACKING SHEET**

BLANK TRUCK  
TRACKING SHEET

Rad Scan

☐

PPE (Circle One) Level B / Level C

Date: Customer

Generator:

Transporter: Profile:

Volume: Trailer# Truck#

**WASTE DESCRIPTION**

LDR YES NO One time N/A

**MONITORING:**

H2S: T40 Rattler 3/4 Gas Meter

**LEL/OXYGEN READINGS: (circle one)**

LEL <10% > 10% \* OXYGEN <16% \* >16%

\*contact Plant Supervisor, and or Compliance Manager

\*LEL 10-25, lab check flash point ( must be >140 F to process)

\*LEL > 25, reject truck

TRUCK ARRIVAL TIME AM/PM Date

\*\*\* If truck is not processed within 24 hours of arrival time, truck must be rejected

	TIME	DATE	INITIALS
Sample Rec'd in Lab	AM/PM		
Sample Approved	AM/PM		
Pump Started	AM/PM		
Finish Pump Time	AM/PM		
Sign Off Paperwork	AM/PM		

**WASTE PATHWAY**

AS IS to Tank 2 3 6 7 8 9 A B C TK5 F039

PRETREATMENT R1 R2 AR12 AR34

POST TREATMENT TANK 1 2 3 6 7

Rinse Out Needed

YES NO

Gallons of oil to TKC Verify R1 or R2, Tank

ADDITIONAL COMMENTS: (CIRCLE IF APPLICABLE)

OFF SPEC REJECT NOT SCHEDULED LATE ARRIVAL NO WORK ORDER

TANKER CLEAN OUT YES NO Initials

\* Yes, Interior of waste hauling portion of vehicle was rinsed and determined clean by visual inspection

\* NO, there are some residual solids, Amount Gallons

COMMENTS:



Trailer #: \_\_\_\_\_

### INCOMING ANALYSIS

Generator: \_\_\_\_\_ Date Received: \_\_\_\_\_ Date Pumped: \_\_\_\_\_ Time: \_\_\_\_\_

Hauler: \_\_\_\_\_ Profile: \_\_\_\_\_ SO #: \_\_\_\_\_ Volume (gal): \_\_\_\_\_

EPA Haz Waste Codes: \_\_\_\_\_ Manifest #: \_\_\_\_\_ Volume (lb): \_\_\_\_\_

CAT. DIS. STD.: \_\_\_\_\_ If Yes: \_\_\_\_\_ S.G.: \_\_\_\_\_

PHASE	%	COLOR	OPACITY	PHYS. STATE	ODOR	FP
TOP	_____	_____	_____	_____	_____	_____
BOTTOM	_____	_____	_____	_____	_____	_____
pH	S.U.	N.E.	_____	ml	Rad. Scan	(+) (-)

NH<sub>3</sub> \_\_\_\_\_ ppm S \_\_\_\_\_ ppm

Total CN \_\_\_\_\_ ppm Free CN \_\_\_\_\_ ppm

Cr<sup>6+</sup> \_\_\_\_\_ ppm Oxidizer \_\_\_\_\_ ppm C.O.D. \_\_\_\_\_ ppm

Phenol \_\_\_\_\_ ppm NO<sub>2</sub> \_\_\_\_\_ ppm Chloride \_\_\_\_\_ ppm

Total P \_\_\_\_\_ ppm NO<sub>3</sub> \_\_\_\_\_ ppm Ortho P \_\_\_\_\_ ppm

PCBs \_\_\_\_\_ VOA \_\_\_\_\_ Oil/Grease \_\_\_\_\_ ppm

Ag	As	Ba	Cd	Co	Cr	Cu	Fe	Hg
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
Mo	Ni	Pb	Sb	Se	Sn	Ti	V	Zn
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____

Metals Amount: \_\_\_\_\_

Lab Treatment \_\_\_\_\_ Plant Treatment \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Drum #: \_\_\_\_\_ Lab Chemist: \_\_\_\_\_ SS \_\_\_\_\_ g/l

Lab Code: \_\_\_\_\_ Process Status: \_\_\_\_\_

PATHWAY: \_\_\_\_\_

CLLB 300	W C E N
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# Appendix D

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Email correspondence  
between Susan Sevy of  
CHESI and Brenda  
Whitney of EPA.

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Email dates: December 16,  
2013 through January 15, 2014

**Attachments:**

1. Inspection log from 11/16/13  
through 12/16/13
  2. Used oil and antifreeze profiles
  3. Inspection logs from 11/1/12  
through 12/31/12 and 11/1/11  
through 12/31/11
  4. Contingency plan attachments
  5. Weekly inspection log for 12/2/13
  6. EPA Acknowledgment of  
Consent for exporting hazardous  
waste.
-



## Whitney, Brenda

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**From:** Sevy, Susan J [sevys@cleanharbors.com]  
**Sent:** Wednesday, January 15, 2014 11:50 AM  
**To:** Whitney, Brenda  
**Subject:** RE: Follow up on the 90- day issue we discussed  
**Attachments:** Burton-Sarnia Landfill 006682-3E-13.pdf; 2013-insp management.xlsx

Brenda, please see below. Please let me know if you need anything else from us!

Regards,

Susan

---

**From:** Whitney, Brenda [mailto:whitney.brenda@epa.gov]  
**Sent:** Wednesday, January 15, 2014 10:51 AM  
**To:** Sevy, Susan J  
**Subject:** FW: Follow up on the 90- day issue we discussed

Sorry for the piecemeal emails, but I have one more request to attach to my email below.

- Please provide a copy of the EPA Acknowledgment of Consent for the exported loads associated with the Tank 5 cleanout. I understand that you may need to obtain this notice from the primary exporter. The shipment dates that I have for those loads are from 9/23/13 (manifest 006835407FLE), 9/24/13 (manifest 006835409 FLE), and 11/12/13 (manifest 006768342 FLE). Please see attached. 006682/3E/13

ATTACHMENT 6

Thanks again!

BW

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**From:** Whitney, Brenda  
**Sent:** Tuesday, January 14, 2014 4:29 PM  
**To:** 'Sevy, Susan J'  
**Subject:** RE: Follow up on the 90- day issue we discussed

Hi Susan,

I did have a couple of follow-up remarks. The numbers correspond with my original email.

1. Antifreeze may become contaminated with hazardous metals through use in an engine. It happens with some regularity, which is why some states (Michigan, for example) actually put antifreeze on their universal waste list. I would suggest you run a sample of the spent antifreeze to use in support of your non-hazardous waste claim. Generator knowledge is incomplete for this waste stream. We will do this.
3. I did not see an inspection for the 90-day drum pad for 12/2/2013, if there is one. Lucy provided the copy of the 12/3 inspection during the site visit, the attachment shows that it had been completed but in hard copy form. See line item #46 on spreadsheet. All the inspectors in Cleveland had connectivity issues on 12/2 and 12/3 intermittently. There have been two assorted times when our internet provider has been down; one from the weather and the other due to a cement truck taking the lines down. There was some difficulty in getting Cleveland running smoothly during that time. Please note that Cleveland exceeds the inspection requirement for the 90-day area, and inspects on a daily basis when in operation. Therefore the inspection did occur on the 12/2 and 12/3 dates. Please reference attachment.

1. ATTACHMENT 5

5. Why is the satellite container not kept at the point of generation, which appears to be at the 2900 Rockefeller address? The maintenance employee brings the fluids/aerosols from the maintenance office and will perform work in every aspect of the plant where maintenance activities are required. It could be as simple as a lubricating endeavor to tearing down and repairing equipment. This activity would have so many satellite areas due to the nature of the maintenance activity. So we have been successful with all other agency audits using the maintenance shop for the satellite area for maintenance generated wastes. This would not be true if we generated a large quantity at one time during an activity. In this case, we drum it and ship immediately.

---

**From:** Sevy, Susan J [<mailto:sevys@cleanharbors.com>]  
**Sent:** Tuesday, January 14, 2014 2:25 PM  
**To:** Whitney, Brenda  
**Subject:** RE: Follow up on the 90- day issue we discussed

Hello Brenda, I hope the attached satisfies all the inquiries. If not, please let me know. The last document is an example of the inspection management screen that shows the drop down box to assign the corrected circumstance for the missed inspection. The general inspector is not allowed into this screen. The GM or the compliance manager asks the inspector what happened, and assigns the status.

Please let me know what else I can do to assist with the audit process.

Regards,

Susan

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**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Tuesday, January 14, 2014 12:34 PM  
**To:** Sevy, Susan J  
**Subject:** RE: Follow up on the 90- day issue we discussed

Hi Susan,

I have a few questions and requests for you.

1. Regarding the antifreeze profile that you sent: I see that the waste determination for this waste stream was made using generator knowledge. I did not see a process description or any other information that would lend support to the knowledge used. Antifreeze may become hazardous through use, and an MSDS does not account for that use. Please let me know if you have any other supporting data for this waste stream. This antifreeze is coming from the truck maintenance shop only, so it is only from the trucks Clean Harbors maintenance mechanics maintain. There should not be any reason for this material to be anything else other than antifreeze and water. I have suggested we modify the profile to represent that, will that work for you?
2. Regarding the used oil profile that you sent: I believe that this material is going for recycling. If that is true, please note that the profile and containers of this material should not refer to this material as "waste oil" or "recyclable waste oil" (unless it is a requirement of DOT that you do so). Waste oils under RCRA are intended for disposal and require a hazardous waste determination. Please confirm that this material is to be recycled. The oil is in fact going for recycling and it is not RCRA waste. If you notice that since this is a profile used throughout the whole company, some of States do regulate the non hazardous oil streams generated within their State. These States do have their own waste codes that are recognized by their State only, and renders the material as a waste oil. This is the sole reason the word waste is employed in the profile. We have two selections of DOT descriptions to use; one as NON RCRA Hazardous, and the other waste oil. So since Ohio does not regulate non regulated/non hazardous oils, we opt for the first shipping description in this profile.



- ATTACHMENT 3
3. Regarding the inspection log that you sent: You sent a log reporting inspections from 11/16/2013 through 12/16/2013. It appears that inspections were not conducted at the 90-day pad between 11/25/13 and 12/4/13 (which is greater than 7 days). When I was at the facility, Luz gave me a record of inspections for 12/3/13. This record shows that inspections were conducted at the 90-day pad that day.
- a. Do you know why this information may not have translated into the log that you sent me? Yes. Since this is an electronic system, there are times when connectivity does not occur for a multitude of reasons and cannot facilitate an inspection within the framework of the system design. I have attached a document that tracks the "missed inspections". A missed inspection to the electronic system is any inspection that is not completed in the electronic system. The far right indicates the reason for the "missed inspection" which may really not be missed but recorded in a hard copy format. These hard copies are maintained in a file for the year as the back up document to the electronic system. This is why Lucy was able to produce a hard copy for you, but that hard copy is not available in the inspection log. The inspection management screen which is a different tool within the inspection workbench that tracks inspections that may have been accounted for other than electronically, Or, inspections that were truly missed, or did not need to occur on a non-operating day.
  - b. Might there also be a record for 12/2/13 (which would make it 7 days)? The scanned document should provide compliance with your request. As you saw hard copy on site, and the account of the hard copy is in the copy of the inspection management log I have provided.
  - c. Please forward me records for November 1 through December 31 for the years 2011 and 2012. See attachments
- ATTACHMENT 4
4. Luz gave me a copy of the contingency plan for the 2900 site so that I could review it at the office. The plan references tables and appendices, which I do not have. Please forward me the following: Tables G1, G2, and G3, and Appendix G2. Attached
5. Is it accurate to use the MAD039322250 EPA ID number to identify the buildings at the 2930 Independence address (drum hub, truck maintenance area, and field services building)? I am considering these areas to be conditionally exempt small quantity generators of hazardous waste because they generate aerosol cans, ignitable liquid wastes, used oil, and universal waste. Please let me know if you think this designation is incorrect. MAD039322250 is okay to identify the Truck to Truck transfer activity as it is a terminal for the corporate entity. The satellite area is waste that Plant Maintenance generates. The Plant maintenance shop is not located at the permitted facility but the waste is generated by conducting maintenance at the permitted facility (2900 Rockefeller Avenue). This waste does get identified as OHD000724153 waste, shipped out under OHD000174153 and is reported for on the annual report to the State of Ohio under that EPA ID#.

Please let me know if you have any questions or concerns, or if my questions/requests do not make sense to you. I would be happy to elaborate if needed.

Thanks!

Brenda

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Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)

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**From:** Sevy, Susan J [<mailto:sevys@cleanharbors.com>]

**Sent:** Monday, December 16, 2013 10:25 AM

**To:** Whitney, Brenda

**Subject:** Follow up on the 90- day issue we discussed

Hello Brenda, here is the information that I promised to provide. The first two pages are the actual inspection form for the 90 pad area. The remaining pages show the date that the 90 day inspection was completed. It should be under the "Area" column. Please note that Clean Harbors Cleveland Facility exceeds the inspection requirement of a weekly requirement by inspecting the area daily! - ATTACHMENT 1

I have also attached the profiles as requested during the audit. - ATTACHMENT 2

Please let me know what else I can help you with. Thank you.

Susan

Weekly Inspections  
90-Day Drum PAD  
November 16, 2013  
Through  
December 16, 2013







## CONTAINER STORAGE AREA INSPECTION FORM

FormCode **COCMPFRM03**

Weekly INSPECTIONS  
90-DAY DRUM PAD  
Nov 16, 13 → Dec 16, 13

Full Name:		Date:	12/16/2013			
Location:	90 Day Pad		Military Time:			
<b>Instructions:</b> Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.						
INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT	
Container Placement and Stacking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Sealing of Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Labeling of Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Containers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Pallets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Doors (indoor area)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Base / Foundation / Roof	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Berms / Racks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Debris and Refuse	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			
Warning Signs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>			

Aisle Space	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Loading and Unloading Areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Sumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Alarm and Communication System	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Storage Capacity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Bonding / Grounding	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Pumps	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
Inventory Age	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
<div></div>					
On-Demand Work Ticket (please describe reason below)					
<div></div>					
Select Overall Assessment of Inspection Results	<div>Pass</div>				



Supervisor's Signature \_\_\_\_\_

## Inspection Log

Location: CL - Clean Harbors Env Services Inc - 2900 Rockefeller Avenue

Inspection Status: All

Area: All

Inspection From Date: 11/16/2013

Inspection To Date: 12/16/2013

Approval Status:

Passed

Failed

	Location	Inspection	Inspection By	Inspection Date	Inspection Status	Inspection Type	Inspection Frequency	Area	Area Type	Approved By	Approved Date	Appr B
	CL	DAILY TIT INSPECTION	oren hargrove	12/16/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	TANK SYSTEMS	Lucy Marrero	12/13/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA			
	CL	SITE SECURITY	Lucy Marreor	12/13/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area			
	CL	CL LABORATORY	Lucy Marrero	12/13/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	CONTAINER STAGING	Lucy Marrero	12/13/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad			
	CL	DAILY TIT INSPECTION	oren hargrove	12/13/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	TANK SYSTEMS	Lucy Marrero	12/12/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA			
	CL	SITE SECURITY	Lucy Marrero	12/12/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area			
	CL	CL LABORATORY	Lucy Marrero	12/12/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	CONTAINER STAGING	Lucy Marrero	12/12/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad			
	CL	Tank External	susan sevy	12/12/2013	P	TANK	1 Year from Last Inspection	TK7	Tank			
	CL	Tank External	Susan Sevy	12/12/2013	P	TANK	1 Year from Last Inspection	TK3	Tank			
	CL	Tank External	Susan Sevy	12/12/2013	P	TANK	1 Year from Last Inspection	TK1	Tank			
	CL	DAILY TIT INSPECTION	oren hargrove	12/12/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	Tank External	Susan Sevy	12/12/2013	P	TANK	1 Year from Last Inspection	CLCTU	Tank			
	CL	TANK SYSTEMS	Lucy Marrero	12/11/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA			
	CL	SITE SECURITY	Lucy Marrero	12/11/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area			
	CL	CL LABORATORY	Lucy Marro	12/11/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility			
	CL	CONTAINER STAGING	Lucy Marrero	12/11/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad			
	CL	TANK SYSTEMS	Lucy Marrero	12/10/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA			
	CL	SITE SECURITY	Lucy Marrero	12/10/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area			
	CL	CL	Lucy	12/10/2013	P	PERMIT	DAY - 5	Cleveland	Facility			

	CL	LABORATORY CONTAINER STAGING	Marrero Lucy Marrero	12/10/2013	F	REQD PERMIT REQD	DAYS DAY - 5 DAYS	Facility 90 Day Pad	Storage Pad
	CL	DAILY TTI INSPECTION	oren hargrove	12/10/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	TANK SYSTEMS	Lucy marrero	12/09/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
	CL	SITE SECURITY	Lucy Marrero	12/09/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
	CL	CL LABORATORY	Lucy Marrero	12/09/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	CONTAINER STAGING	Lucy Marrero	12/09/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
	CL	GM WEEKLY INSPECTION	Albert Benavides	12/09/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility
	CL	DAILY TTI INSPECTION	oren hargrove	12/09/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	TANK SYSTEMS	Lucy Marrero	12/06/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
	CL	SITE SECURITY	Lucy Marrero	12/06/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
	CL	CL LABORATORY	Lucy Marrero	12/06/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	CONTAINER STAGING	Lucy Marrero	12/06/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
	CL	DAILY TTI INSPECTION	oren hargrove	12/06/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	DAILY TTI INSPECTION	Oren Hargrove	12/05/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	TANK SYSTEMS	Lucy Marrero	12/05/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
	CL	SITE SECURITY	Lucy marrero	12/05/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
	CL	CL LABORATORY	Lucy Marrero	12/05/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	CONTAINER STAGING	Lucy Marrero	12/05/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
	CL	TANK SYSTEMS	Lucy marrero	12/04/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
	CL	SITE SECURITY	Lucy marrero	12/04/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
	CL	CL LABORATORY	Lucy marrero	12/04/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
	CL	CONTAINER STAGING	Lucy Marrero	12/04/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
	CL	Tank Internal	Susan Sevy	12/04/2013	P	TANK	5 Years from Last Inspection	LIMESILO	Tank
	CL	Tank External	Susan Sevy	12/04/2013	P	TANK	1 Year from Last Inspection	LIMESILO	Tank
	CL	GM WEEKLY INSPECTION	Albert Benavides	12/04/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility
	CL	TANK SYSTEMS	Lucy Marrero	11/25/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
	CL	SITE SECURITY	Lucy Marrero	11/25/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
	CL	CL LABORATORY	Lucy Marrero	11/25/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility

3	CL	CONTAINER STAGING	Lcy Marrero	11/25/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
3	CL	GM WEEKLY INSPECTION	Albert Benavides	11/25/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility
3	CL	DAILY TTT INSPECTION	oren hargrove	11/25/2013	F	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	TANK SYSTEMS	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
3	CL	SITE SECURITY	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
3	CL	CL LABORATORY	Lucy Marrero	11/22/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	CONTAINER STAGING	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
3	CL	DAILY TTT INSPECTION	oren hargrove	11/22/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	DAILY TTT INSPECTION	oren hargrove	11/21/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	TANK SYSTEMS	Lucy Marrero	11/21/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
3	CL	SITE SECURITY	Lucy Marrero	11/21/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
3	CL	CL LABORATORY	Lucy Marrero	11/21/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	CONTAINER STAGING	Lucy Marrero	11/21/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	R2	Tank
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	TK9	Tank
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	TK8	Tank
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	R1	Tank
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	AR34	Tank
3	CL	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	AR12	Tank
3	CL	TANK SYSTEMS	Lucy Marrero	11/20/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA
3	CL	SITE SECURITY	Lucy Marrero	11/20/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
3	CL	CL LABORATORY	Lucy Marrero	11/20/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
3	CL	CONTAINER STAGING	Lucy Marrero	11/20/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad
3	CL	GM WEEKLY INSPECTION	Albert Benavides	11/20/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility



USED OIL &  
ANTIFREEZE PROFILES







A Clean Harbors Company

## WASTE MATERIAL PROFILE SHEET

Profile No. 150105

## A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #

PENDING

GENERATOR NAME:

Clean Harbors Env Services Inc

GENERATOR CODE (Assigned by Clean Harbors)

CLE234

CITY

Norwell

STATE/PROVINCE

MA

ZIP/POSTAL CODE

02061

ADDRESS 42 Longwater Drive

PHONE:

CUSTOMER CODE (Assigned by Clean Harbors)

CLE234

CUSTOMER NAME:

Clean Harbors Env Services Inc

ADDRESS 42 Longwater Drive

CITY

Norwell

STATE/PROVINCE

MA

ZIP/POSTAL CODE

02061

## B. WASTE DESCRIPTION

WASTE DESCRIPTION: OIL, USED

NOT-REG

PROCESS GENERATING WASTE:

CORE USED OIL

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? No

## C. PHYSICAL PROPERTIES (at 25C or 77F)

<b>PHYSICAL STATE</b> SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID <input checked="" type="checkbox"/> LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	<b>NUMBER OF PHASES/LAYERS</b> <input checked="" type="checkbox"/> 1    2    3    TOP    0.00 % BY VOLUME (Approx.)    MIDDLE    0.00 BOTTOM    0.00				<b>VISCOSITY (If liquid present)</b> 1 - 100 (e.g. Water) <input checked="" type="checkbox"/> 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000		<b>COLOR</b>  varies					
	<b>ODOR</b> <input checked="" type="checkbox"/> NONE MILD STRONG Describe:		<b>BOILING POINT °F (°C)</b> <= 95 (<=35) 95 - 100 (35-38) 101 - 129 (38-54) <input checked="" type="checkbox"/> >= 130 (>54)		<b>MELTING POINT °F (°C)</b> < 140 (<60) 140-200 (60-93) > 200 (>93)			<b>TOTAL ORGANIC CARBON</b> <= 1% 1-9% <input checked="" type="checkbox"/> >= 10%				
	<b>FLASH POINT °F (°C)</b> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) <input checked="" type="checkbox"/> > 200 (>93)		<b>pH</b> <= 2 2.1 - 6.9 <input checked="" type="checkbox"/> 7 (Neutral) 7.1 - 12.4 >= 12.5		<b>SPECIFIC GRAVITY</b> < 0.8 (e.g. Gasoline) <input checked="" type="checkbox"/> 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)				<b>ASH</b> < 0.1    > 20 0.1 - 1.0 <input checked="" type="checkbox"/> Unknown 1.1 - 5.0 5.1 - 20.0		<b>BTU/LB (MJ/kg)</b> < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) <input checked="" type="checkbox"/> > 10,000 (>23.2) Actual:	

## D. COMPOSITION

(List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

## CHEMICAL

MIN -- MAX UOM

## MOTOR OIL

50.0000000 -- 100.0000000 %

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING: ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES ☒ NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. G08

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. W206



A Clean Harbors Company

Profile No. 150105

#### E. CONSTITUENTS

Are these values based on testing or knowledge? ☒ Knowledge ☐ Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Knowledge of process chemistry or MSDS

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE	
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>	
D005	BARIUM	100.0				<input checked="" type="checkbox"/>	
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>	
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>	
D008	LEAD	5.0				<input checked="" type="checkbox"/>	
D009	MERCURY	0.2				<input checked="" type="checkbox"/>	
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>	
D011	SILVER	5.0				<input checked="" type="checkbox"/>	
VOLATILE COMPOUNDS				OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
D018	BENZENE	0.5		BROMINE			<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5		CHLORINE			<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0		FLUORINE			<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0		IODINE			<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5		SULFUR			<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7		POTASSIUM			<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0		SODIUM			<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7		AMMONIA			<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5		CYANIDE AMENABLE			<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2		CYANIDE REACTIVE			<input checked="" type="checkbox"/>
SEMI-VOLATILE COMPOUNDS				CYANIDE TOTAL			<input checked="" type="checkbox"/>
D023	o-CRESOL	200.0		SULFIDE REACTIVE			<input checked="" type="checkbox"/>
D024	m-CRESOL	200.0					
D025	p-CRESOL	200.0					
D026	CRESOL (TOTAL)	200.0					
D027	1,4-DICHLOROBENZENE	7.5					
D030	2,4-DINITROTOLUENE	0.13					
D032	HEXACHLOROBENZENE	0.13					
D033	HEXACHLOROBTADIENE	0.5					
D034	HEXACHLOROETHANE	3.0					
D036	NITROBENZENE	2.0					
D037	PENTACHLOROPHENOL	100.0					
D038	PYRIDINE	5.0					
D041	2,4,5-TRICHLOROPHENOL	400.0					
D042	2,4,6-TRICHLOROPHENOL	2.0					
PESTICIDES AND HERBICIDES							
D012	ENDRIN	0.02					
D013	LINDANE	0.4					
D014	METHOXYCHLOR	10.0					
D015	TOXAPHENE	0.5					
D016	2,4-D	10.0					
D017	2,4,5-TP (SILVEX)	1.0					
D020	CHLORDANE	0.03					
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008					

#### ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

#### CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS

POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL

☒ NONE OF THE ABOVE

**F. REGULATORY STATUS**

YES ☒ NO USEPA HAZARDOUS WASTE?

YES ☒ NO DO ANY STATE WASTE CODES APPLY?  
017L 221 223 7777 CR02 MA98 R014 VT99 X007  
Texas Waste Code TXEXEMPT

YES ☒ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?  
254T

YES ☒ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?  
LDR CATEGORY: Not subject to LDR  
VARIANCE INFO:

YES ☒ NO IS THIS A UNIVERSAL WASTE?

YES ☒ NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES ☒ NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☒ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☒ NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES ☒ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☒ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☒ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☒ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE?

YES ☒ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?  
Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?  
YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?  
YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?  
What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)  
The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing  
Describe the knowledge:

**G. DOT/TDG INFORMATION**

DOT/TDG PROPER SHIPPING NAME:

NON RCRA HAZARDOUS WASTE LIQUIDS, (USED OIL)

RECYCLABLE WASTE OIL (LEACHABLE TOXIC) WASTE NOT REGULATED BY TDG, (BC HW, AB WT201, ON 254T)

**H. TRANSPORTATION REQUIREMENTS**

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY OTHER

CONTAINERIZED		<input checked="" type="checkbox"/> BULK LIQUID	BULK SOLID	
0-0 CONTAINERS/SHIPMENT		GALLONS/SHIPMENT: 1.00 Min - 9999.00 Max	SHIPMENT UOM:	TON YARD
STORAGE CAPACITY:			TONS/YARDS/SHIPMENT: 0 Min - 0 Max	
CONTAINER TYPE:				
CUBIC YARD BOX	PALLET			
TOTE TANK	DRUM			
OTHER:	DRUM SIZE:			

**I. SPECIAL REQUEST**

COMMENTS OR REQUESTS:

**GENERATOR'S CERTIFICATION**

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE

\*40 CFR Sec. 264.12 required notice:

As required by Federal Resource Conservation and Recovery Act regulations found in 40 CFR Part 264.12(b) and all equivalent State hazardous waste regulations, notice is hereby provided that all Clean Harbors facilities that may be used to treat, store, and/or dispose of the hazardous waste described on this waste profile have the appropriate permits and the capacity to manage these wastes.

Please note this profile must be submitted for re-evaluation if there has been a change in the waste generating process or when there have been changes in the chemical composition or physical characteristics of the material.

**Addendum**

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**G. DOT/TDG INFORMATION**

**DOT/TDG PROPER SHIPPING NAME:**

**USED OIL (MADEP MA98 - OFF SPEC) NON DOT REGULATED**

**USED OIL NON DOT REGULATED**

**WASTE OIL NON DOT REGULATED**



A Clean Harbors Company

## WASTE MATERIAL PROFILE SHEET

Profile No. 150163

## A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION # **PENDING** GENERATOR NAME: **Clean Harbors Env Services Inc**  
 GENERATOR CODE (Assigned by Clean Harbors) **CLE234** CITY **Norwell** STATE/PROVINCE **MA** ZIP/POSTAL CODE **02061**  
 ADDRESS **42 Longwater Drive** PHONE:  
 CUSTOMER CODE (Assigned by Clean Harbors) **CLE234** CUSTOMER NAME: **Clean Harbors Env Services Inc**  
 ADDRESS **42 Longwater Drive** CITY **Norwell** STATE/PROVINCE **MA** ZIP/POSTAL CODE **02061**

## B. WASTE DESCRIPTION

WASTE DESCRIPTION: **ANTIFREEZE - BULK**PROCESS GENERATING WASTE: **bulk AF collection**IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? **No**

## C. PHYSICAL PROPERTIES (at 25C or 77F)

<b>PHYSICAL STATE</b> SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID <input checked="" type="checkbox"/> LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	<b>NUMBER OF PHASES/LAYERS</b> <input checked="" type="checkbox"/> 1    2    3    TOP    0.00 % BY VOLUME (Approx.)    MIDDLE    0.00 BOTTOM    0.00		<b>VISCOSITY (if liquid present)</b> 1 - 100 (e.g. Water) <input checked="" type="checkbox"/> 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000	<b>COLOR</b> <u>varies</u>	
	<b>ODOR</b> NONE <input checked="" type="checkbox"/> MILD STRONG Describe:	<b>BOILING POINT °F (°C)</b> <= 95 (<=35) 95 - 100 (35-38) 101 - 129 (38-54) <input checked="" type="checkbox"/> >= 130 (>54)	<b>MELTING POINT °F (°C)</b> < 140 (<60) 140-200 (60-93) > 200 (>93)	<b>TOTAL ORGANIC CARBON</b> <= 1% 1-9% <input checked="" type="checkbox"/> >= 10%	
	<b>FLASH POINT °F (°C)</b> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) <input checked="" type="checkbox"/> > 200 (>93)	<b>pH</b> <= 2 2.1 - 6.9 <input checked="" type="checkbox"/> 7 (Neutral) 7.1 - 12.4 >= 12.5	<b>SPECIFIC GRAVITY</b> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) <input checked="" type="checkbox"/> 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)	<b>ASH</b> < 0.1    > 20 0.1 - 1.0 <input checked="" type="checkbox"/> Unknown 1.1 - 5.0 5.1 - 20.0	<b>BTU/LB (MJ/kg)</b> <input checked="" type="checkbox"/> < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) > 10,000 (>23.2) Actual:

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

## CHEMICAL

ETHYLENE GLYCOL

MIN	MAX	UOM
45.00000000	90.00000000	%

WATER

45.00000000	90.00000000	%
-------------	-------------	---

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")?

YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM?

YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING: ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL?

YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material.

YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste.

YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS.

YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED.

YES ☒ NOSPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. **G09**SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. **W219**

## E. CONSTITUENTS

Are these values based on testing or knowledge? ☒ Knowledge ☐ Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and/or detailed process or operating procedures which generate the waste.

Knowledge of process chemistry or MSDS

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>
<b>VOLATILE COMPOUNDS</b>						
D018	BENZENE	0.5				<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5				<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0				<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0				<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5				<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0				<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5				<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2				<input checked="" type="checkbox"/>
<b>SEMI-VOLATILE COMPOUNDS</b>						
D023	o-CRESOL	200.0				<input checked="" type="checkbox"/>
D024	m-CRESOL	200.0				<input checked="" type="checkbox"/>
D025	p-CRESOL	200.0				<input checked="" type="checkbox"/>
D026	CRESOL (TOTAL)	200.0				<input checked="" type="checkbox"/>
D027	1,4-DICHLOROBENZENE	7.5				<input checked="" type="checkbox"/>
D030	2,4-DINITROTOLUENE	0.13				<input checked="" type="checkbox"/>
D032	HEXACHLOROBENZENE	0.13				<input checked="" type="checkbox"/>
D033	HEXACHLOROBUTADIENE	0.5				<input checked="" type="checkbox"/>
D034	HEXACHLOROETHANE	3.0				<input checked="" type="checkbox"/>
D036	NITROBENZENE	2.0				<input checked="" type="checkbox"/>
D037	PENTACHLOROPHENOL	100.0				<input checked="" type="checkbox"/>
D038	PYRIDINE	5.0				<input checked="" type="checkbox"/>
D041	2,4,5-TRICHLOROPHENOL	400.0				<input checked="" type="checkbox"/>
D042	2,4,6-TRICHLOROPHENOL	2.0				<input checked="" type="checkbox"/>
<b>PESTICIDES AND HERBICIDES</b>						
D012	ENDRIN	0.02				<input checked="" type="checkbox"/>
D013	LINDANE	0.4				<input checked="" type="checkbox"/>
D014	METHOXYCHLOR	10.0				<input checked="" type="checkbox"/>
D015	TOXAPHENE	0.5				<input checked="" type="checkbox"/>
D016	2,4-D	10.0				<input checked="" type="checkbox"/>
D017	2,4,5-TP (SILVEX)	1.0				<input checked="" type="checkbox"/>
D020	CHLORDANE	0.03				<input checked="" type="checkbox"/>
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				<input checked="" type="checkbox"/>

OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
BROMINE			<input checked="" type="checkbox"/>
CHLORINE			<input checked="" type="checkbox"/>
FLUORINE			<input checked="" type="checkbox"/>
IODINE			<input checked="" type="checkbox"/>
SULFUR			<input checked="" type="checkbox"/>
POTASSIUM			<input checked="" type="checkbox"/>
SODIUM			<input checked="" type="checkbox"/>
AMMONIA			<input checked="" type="checkbox"/>
CYANIDE AMENABLE			<input checked="" type="checkbox"/>
CYANIDE REACTIVE			<input checked="" type="checkbox"/>
CYANIDE TOTAL			<input checked="" type="checkbox"/>
SULFIDE REACTIVE			<input checked="" type="checkbox"/>

HOCs	PCBs
<input checked="" type="checkbox"/> NONE	<input checked="" type="checkbox"/> NONE
< 1000 PPM	< 50 PPM
>= 1000 PPM	>= 50 PPM
IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?	
YES	<input checked="" type="checkbox"/> NO

### ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

### CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS  
 POLYMERIZABLE RADIOACTIVE REACTIVE MATERIAL ☒ NONE OF THE ABOVE

**F. REGULATORY STATUS**

YES ☒ NO USEPA HAZARDOUS WASTE?

☒ YES NO DO ANY STATE WASTE CODES APPLY?  
030L 342 7777 CR04 MA99 R015 X007  
Texas Waste Code TXEXEMPT

YES ☒ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

YES ☒ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?  
LDR CATEGORY: Not subject to LDR  
VARIANCE INFO:

YES ☒ NO IS THIS A UNIVERSAL WASTE?

YES ☒ NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☒ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES ☒ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☒ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☒ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☒ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE?

YES ☒ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?  
Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?  
YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?  
YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?  
What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)  
The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing  
Describe the knowledge:

**G. DOT/TDG INFORMATION**

DOT/TDG PROPER SHIPPING NAME:

NON RCRA HAZARDOUS WASTE LIQUIDS, (ETHYLENE GLYCOL SOLUTION (LESS THAN 50%))  
SPENT ANTIFREEZE FOR RECYCLING NON DOT REGULATED

**H. TRANSPORTATION REQUIREMENTS**

ESTIMATED SHIPMENT FREQUENCY ONE TIME ☒ WEEKLY MONTHLY QUARTERLY YEARLY OTHER

CONTAINERIZED		<input checked="" type="checkbox"/> BULK LIQUID		BULK SOLID	
0-0 CONTAINERS/SHIPMENT		GALLONS/SHIPMENT: 1.00 Min -9999.00 GAL.		SHIPMENT UOM: TON YARD	
STORAGE CAPACITY:		Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Max	
CONTAINER TYPE:					
CUBIC YARD BOX	PALLET				
TOTE TANK	DRUM				
OTHER:	DRUM SIZE:				

**I. SPECIAL REQUEST**

COMMENTS OR REQUESTS:

**GENERATOR'S CERTIFICATION**

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE

\*40 CFR Sec. 264.12 required notice:

As required by Federal Resource Conservation and Recovery Act regulations found in 40 CFR Part 264.12(b) and all equivalent State hazardous waste regulations, notice is hereby provided that all Clean Harbors facilities that may be used to treat, store, and/or dispose of the hazardous waste described on this waste profile have the appropriate permits and the capacity to manage these wastes.

Please note this profile must be submitted for re-evaluation if there has been a change in the waste generating process or when there have been changes in the chemical composition or physical characteristics of the material.



**Addendum**

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**G. DOT/TDG INFORMATION**

DOT/TDG PROPER SHIPPING NAME:

**USED ANTIFREEZE NON DOT REGULATED**

WEEKLY INSPECTION LOGS  
OF 90-DAY PAD

NOVEMBER - DECEMBER, 2012  
AND

NOVEMBER - DECEMBER, 2011



WEEKLY INSPECTIONS  
90-DAY DRUM PAD  
NOV-DEC, 2012

[illegible]

[illegible]





[illegible]



[illegible]



[illegible]

[illegible]





WEEKLY INSPECTIONS  
90-DAY DRUM PAD  
NOV-DEC, 2011

Search  Clear

Location: CL - Clean Harbors Env Services Inc - 2900 Rockefeller Avenue

Inspection Status: All Area: All

Inspection From: 11/1/2011 To Date: 12/31/2011 Approval Status: All

Pass Fail

ed d

CL	Inspection	Inspector	Date	Status	Permit	Days	Location	Facility
CL	DAILY TTI INSPECTION	Oren Hargrove	12/30/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	TANK SYSTEMS	Lucy Marrero	12/30/2011	P	PERMIT REQD	DAY - 5 DAYS	WWT Plant	Water Treatment Area
CL	SITE SECURITY	Lucy Marrero	12/30/2011	P	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
CL	LABORATORY	Lucy Marrero	12/30/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	CONTAINER STAGING	Lucy Marrero	12/30/2011	P	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Outdoor Storage Area
CL	DAILY LANDFILL	Albert Benavides	12/30/2011	P	LANDFILL	DAY - 5 DAYS	Cleveland Facility	Facility
CL	TANK SYSTEMS	Lucy Marrero	12/29/2011	P	PERMIT REQD	DAY - 5 DAYS	WWT Plant	Water Treatment Area
CL	SITE SECURITY	Lucy Marrero	12/29/2011	P	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
CL	LABORATORY	Lucy Marrero	12/29/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	CONTAINER STAGING	Lucy Marrero	12/29/2011	P	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Outdoor Storage Area
CL	DAILY LANDFILL	Albert Benavides	12/29/2011	P	LANDFILL	DAY - 5 DAYS	Cleveland Facility	Facility
CL	DAILY TTI INSPECTION	Oren Hargrove	12/29/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	TANK SYSTEMS	Lucy Marrero	12/28/2011	P	PERMIT REQD	DAY - 5 DAYS	WWT Plant	Water Treatment Area
CL	SITE SECURITY	Lucy Marrero	12/28/2011	P	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
CL	LABORATORY	Lucy Marrero	12/28/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	CONTAINER STAGING	Lucy Marrero	12/28/2011	P	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Outdoor Storage Area
CL	DAILY LANDFILL	Albert Benavides	12/28/2011	P	LANDFILL	DAY - 5 DAYS	Cleveland Facility	Facility
CL	DAILY TTI INSPECTION	Oren Hargrove	12/28/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	TANK SYSTEMS	Lucy Marrero	12/27/2011	P	PERMIT REQD	DAY - 5 DAYS	WWT Plant	Water Treatment Area
CL	SITE SECURITY	Lucy Marrero	12/27/2011	P	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area
CL	LABORATORY	Lucy Marrero	12/27/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility
CL	CONTAINER STAGING	Lucy Marrero	12/27/2011	P	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Outdoor Storage Area
CL	DAILY LANDFILL	Albert Benavides	12/27/2011	P	LANDFILL	DAY - 5 DAYS	Cleveland Facility	Facility
CL	DAILY TTI INSPECTION	Oren Hargrove	12/27/2011	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility

[illegible]



[illegible]

[illegible]



[illegible]



[illegible]

[illegible]



[illegible]

[illegible]



## ATTACHMENTS TO CONTINGENCY PLAN



**Table G-2**  
**List of Emergency Coordination Agreements**  
Clean Harbors Env. Services, Inc.  
2900 Rockefeller Ave.  
Cleveland, Ohio 44115

**A. FIRE/AMBULANCE**

City of Cleveland Fire Department  
1645 Superior Ave.  
Cleveland, Ohio 44114  
Contact: Cleveland Fire Chief  
**Emergency Number:** 911  
Non-Emergency Number: (216) 664-6350  
Service: Primary response agency for all emergency situations.  
Provide fire control/containment and emergency rescue.

**B. POLICE**

City of Cleveland Police Department  
Justice Center  
1300 Ontario St.  
Cleveland, Ohio 44114  
Contact: Police Chief  
**Emergency Number:** 911 or (216) 621-1234  
Non-Emergency Number: (216) 623-5000  
Service: Control of traffic and criminal activity

**C. HOSPITALS**

**St. Vincent Charity Hospital**  
2351 E. 22<sup>nd</sup> St.  
Cleveland, Ohio 44115  
Contact: Head Nurse (ER)  
**Emergency Room Number:** (216) 363-2536  
General Calls: (216) 861-6200

**Metrohealth Medical Center**  
2500 Metrohealth Drive.  
Cleveland, Ohio 44109  
Contact: Head Nurse (ER)  
**Emergency Room Number:** (216) 778-4152  
General Calls: (216) 398-6000  
Service: Emergency medical services.



**D. OHIO EPA – EMERGENCY RESPONSE TEAM**

Office of Emergency Response  
OEPA – Northeast District  
2110 E. Aurora Rd.  
Twinsburg, Ohio 44087  
Contact: Reginald Brown – Emergency Response Supervisor  
**24-hour Emergency Number: (800) 282-9378**  
Service: Environmental damage assessment/coordination

**E. CUYAHOGA COUNTY EMERGENCY MANAGEMENT**

Cuyahoga County Emergency Management (LEPC)  
1255 Euclid Ave.  
Cleveland, Ohio 44115  
Contact: Brandy Carney – SARA Information Coordinator  
**24-hour Emergency Number: (216) 771-1365**  
Non-Emergency Number: (216) 443-5691  
Service: Environmental damage assessment/coordination

**F. SEWER**

Northeast Ohio Regional Sewer District (NEORSDD)  
4747 E. 49<sup>th</sup> St.  
Cuyahoga Heights, Ohio 44125  
Contact: Scott Broski  
**24-hour Emergency Number: (216) 641-3200**  
Non-Emergency Number: (216) 641-6000  
Service: Sewer Discharge Monitoring

**G. EMERGENCY RESPONSE CONTRACTORS**

Clean Harbors Env. Services, Inc. – Field Services Division  
2930 Independence Ave.  
Cleveland, Ohio 44115  
Contacts: Clay Curtis – General Manager  
**24-hour Emergency Number: (216) 857-7910**  
Paul DiCarro – Coordinator  
**24-hour Emergency Number: (216) 857-5705**

Inland Waters of Ohio  
2195 Drydock Ave.  
Cleveland, Ohio 44115  
Contact: Vince Ambers – Field Services Supervisor  
**24-hour Emergency Number: (216) 861-3949**  
Services: Emergency clean-up, pumping, hauling.

TABLE G-3: EMERGENCY EQUIPMENT CAPABILITIES

EQUIPMENT

CAPABILITIES

Fire sprinkler system has numerous pull stations with strobe lights that will render an audible alert when engaged. This system is connected to a monitoring system that will make the necessary notification to the local fire department authority.

* Telephones	Direct-dial access to outside emergency agencies. Equipped with loud speaker function for emergency announcements and instructions.
* Fire Extinguishers	1) Hand-held units, 5-20 lb. charges (ammonium phosphate), rated for Class A:B:C fires.  2) Hand-held units, 5 lb. charge (Halon), rated for Class B:C fires.
* Fire Hoses	Fire hose stations (2) with 1.5" hoses.
* Sprinkler System	Heat activated sprinkler system in process buildings.
* Eyewash/Showers (Stationary)	Fixed-base deluge showers and eyewash stations for flushing eyes and/or entire body.
* First Aid Kits	General first aid for minor personal injuries such as cuts, scrapes, burns, etc.
* SCBAs	MSA units [3 x 60 minute; 1 x 30 minute] with belt-mounted positive pressure/pressure demand regulators and fiberglass fully-wound composite cylinders.
* Respirators/Cartridges	Full-face and half-face masks (MSA) for air purifying cartridges including: GME-H Super Cartridges for organic vapors, acid gases, ammonia, formaldehyde, hydrogen fluoride, and toxic dusts, fumes and mists; and CMC-H cartridges for organic vapors, acid gases, and toxic dusts, fumes, and mists.
* Tyvek Suits	Polyethylene-coated and Saranex-coated Level "C" suits for protection against contact with spilled/splashed liquids.
* PVC Gloves/Boots	Foot and hand protection from contact with spilled/splashed liquids.
* Safety Glasses/Goggles	Eye protection against moderate impact hazards, metal chips, particulates, and sparks. Goggles and/or faceshields provide eye protection against splashed liquids.
* Eyewash Bottles	16 oz. hand-held units for flushing eyes.
* Absorbents	Speedi-Dri absorbent media for use in cleaning up spilled liquids.
* Buckets/Salvage Drums	Various sizes up to 85-gal. salvage drums.

For containerization of liquids, solids,  
and/or other leaking containers.

TABLE G-3: CONTINUED

EQUIPMENT

CAPABILITIES

Shovels/Squeegees/Brooms

General earth/absorbent moving, construction of berms/dikes to contain spilled liquids, etc.

Sump Pumps w/ Hose

Removal of spilled liquids from containment areas .



**Table G-1**  
**List of Emergency Coordinators**  
Clean Harbors Env. Services, Inc.  
2900 Rockefeller Ave.  
Cleveland, Ohio 44115

**A. Primary Emergency Coordinator**

Albert Benavides- General Manager  
Office phone: (216) 429-2402 ext. 209  
Home phone: (440) 582-1621  
Home address: 7655 Creekwood Drive  
North Royalton, Ohio 44133

**24-hour Emergency Numbers:**

**(216) 857-2228 (Nextel)**

**B. First Alternate**

Dominic Okon- Lab Manager  
Office phone: (216) 429-2402 ext. 216  
Home phone: (216) 932-6541  
Home address: 1925 Revere Rd.  
Cleveland Heights, Ohio 44118

**24-hour Emergency Numbers:**

**(216) 857-2230 (Nextel)**

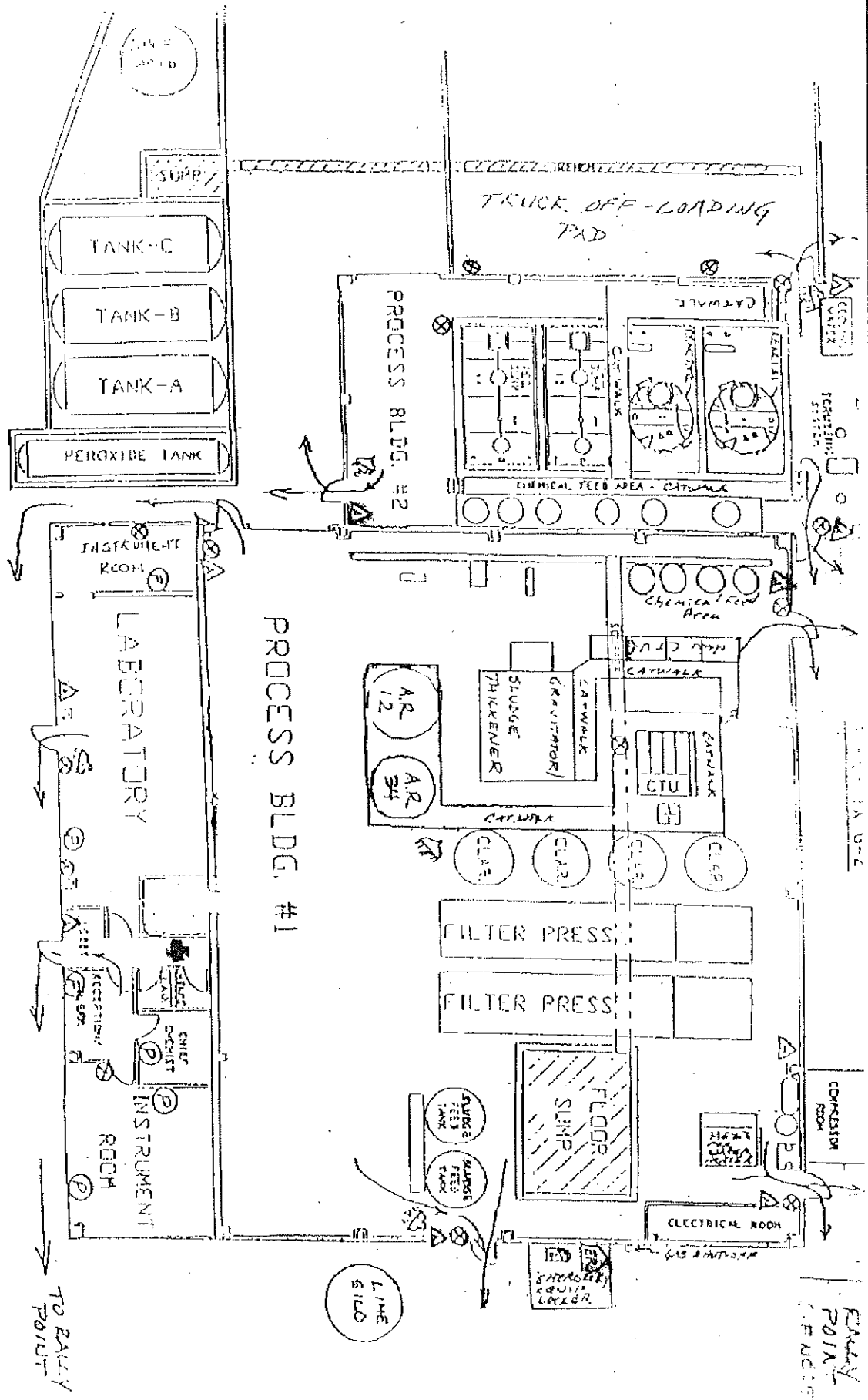
**C. Second Alternate**

Demarcus Dues- Reactor Operator  
Office phone: (216) 429-2402 ext. 218  
Home phone: (440) 488-6357  
Home address: 208 Stone Ridge Way  
Berea, Ohio 44017

**24-hour Emergency Numbers:**

**(216) 214-7004 (Nextel)**

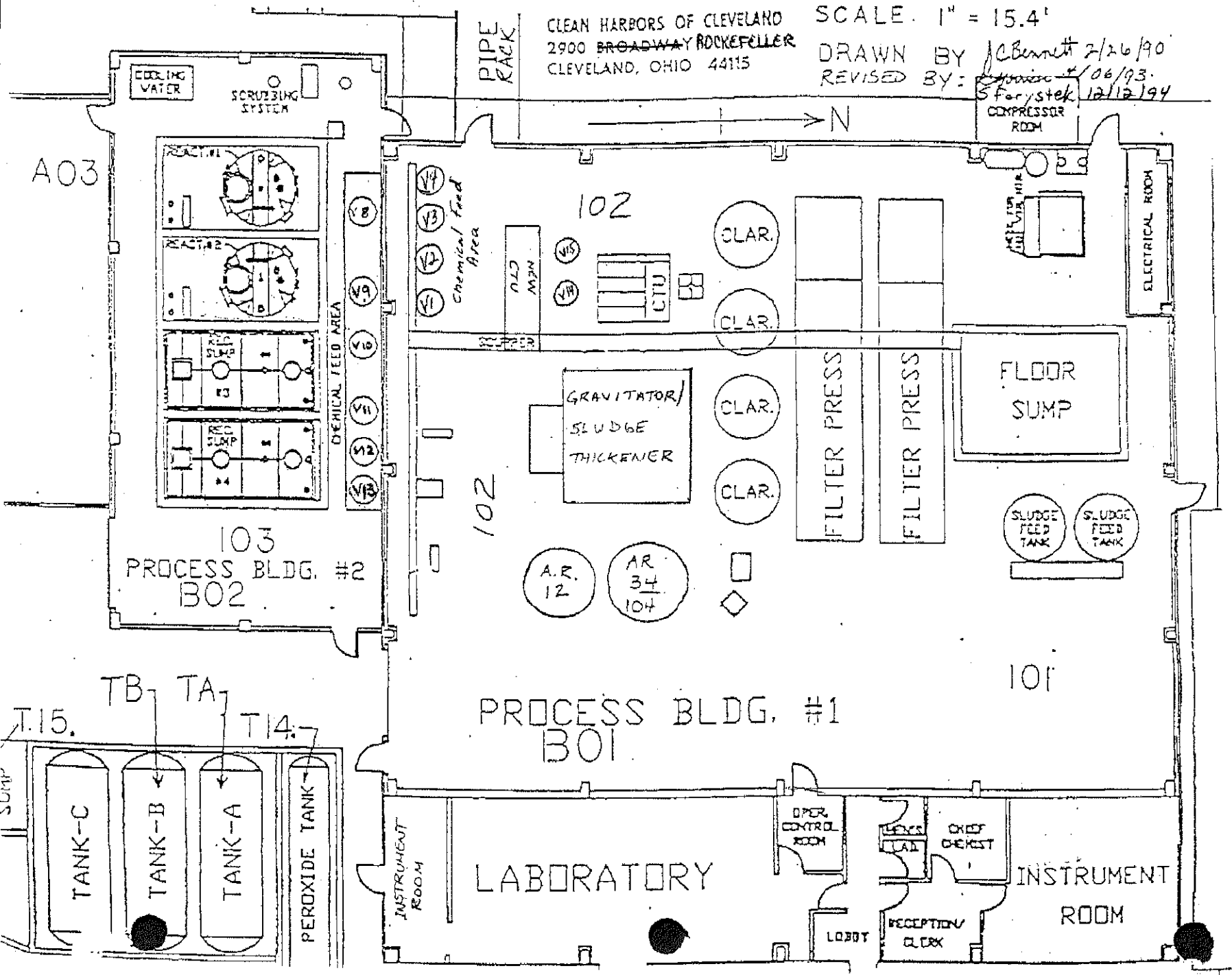




EMERGENCY EQUIPMENT KEY

- (P) TELEPHONE
- (A) FIRE EXTINGUISHER
- (A) FIRE ALARM PULL STATION
- (A) DELUXE SNOW-RETRAY
- (A) EMERGENCY RESPONSE LOCKER
- (A) FIRE BLANKET
- (A) FIRST AID KIT
- (A) DELUXE SHOWER
- (A) STRETCHER
- (A) SCBA'S
- (A) EVACUATION ROUTE





CLEAN HARBORS OF CLEVELAND  
2900 BROADWAY ROCKEFELLER  
CLEVELAND, OHIO 44115

SCALE 1" = 15.4'  
DRAWN BY JCBennett 2/26/90  
REVISED BY: Sfor/stek 4/06/93  
12/12/94

PIPE RACK

A03

COOLING WATER

SCRUZZING SYSTEM

REACTOR #1

REACTOR #2

SLUDGE FEED TANK

SLUDGE FEED TANK

103  
PROCESS BLDG. #2  
B02

T.15.

T.B.

T.A.

T.14.

TANK-C

TANK-B

TANK-A

PEROXIDE TANK

PROCESS BLDG. #1  
B01

INSTRUMENT ROOM

LABORATORY

OPER. CONTROL ROOM

LOBBY

RECEPTION/CLERK

INSTRUMENT ROOM

LEVEL LAD

CHIEF CHEST

FLOOR SUMP

SLUDGE FEED TANK

SLUDGE FEED TANK

FILTER PRESS

FILTER PRESS

CLAR.

CLAR.

CLAR.

CLAR.

A.R. 12

AR 34/104

GRAVITATOR/  
SLUDGE THICKENER

CTU

Chemical Feed Area

V4  
V3  
V2  
V1

VE  
V8  
V9  
V10  
V11  
V12  
V13

102

102

N

COMPRESSOR ROOM

ELECTRICAL ROOM

EPA ACKNOWLEDGMENT OF CONSENT  
FOR EXPORTED MATERIALS





UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND COMPLIANCE  
ASSURANCE

June 6, 2013

JAMES R. LAUBSTED  
CLEAN HARBORS ENVIRONMENTAL SERVICES INC.  
G4475 SOUTH DORT HIGHWAY,  
BURTON, MI US 48529  
MIR000014530

Re: Foreign Notice ID: 531446  
EPA Notice ID: 006682/3E/13

Dear JAMES R. LAUBSTED:

This is to acknowledge receipt of your notice, which was received by EPA on March 14, 2013, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

**Waste Stream 1: SOILS, SOLIDS, DEBRIS CONTAMINATED WITH SPENT POTLINER**

Waste Description: SOILS, SOLIDS, DEBRIS CONTAMINATED WITH SPENT  
POTLINER

EPA Waste Code:

DOT Shipping Name: Aluminum smelting by-products or Aluminum remelting  
by-products

DOT Hazard Class: 4.3

DOT I.D. No. UN3170

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

**Waste Stream 2: SPENT HALOGENATED SOILS, SOLIDS, DEBRIS AND RESIDUES**

Waste Description: SPENT HALOGENATED SOILS, SOLIDS, DEBRIS AND  
RESIDUES

EPA Waste Code:

DOT Shipping Name: Toxic solids, organic, n.o.s.

DOT Hazard Class: 6.1  
DOT I.D. No. UN2811  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 3: CONTAMINATED CORROSIVE, ORGANIC SOILS, SOLIDS & DEBRIS**

Waste Description: CONTAMINATED CORROSIVE, ORGANIC SOILS, SOLIDS &  
DEBRIS

EPA Waste Code:  
DOT Shipping Name: Toxic solids, corrosive, organic, n.o.s.  
DOT Hazard Class: 6.1  
DOT I.D. No. UN2928  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 4: CONTAMINATED INORGANIC TOXIC SOILS, SOLIDS & DEBRIS**

Waste Description: CONTAMINATED INORGANIC TOXIC SOILS, SOLIDS &  
DEBRIS

EPA Waste Code:  
DOT Shipping Name: Toxic solid, inorganic, n.o.s.  
DOT Hazard Class: 6.1  
DOT I.D. No. UN3288  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 5: CONTAMINATED CORROSIVE, INORGANIC SOILS, SOLIDS &  
DEBRIS**

Waste Description: CONTAMINATED CORROSIVE, INORGANIC SOILS, SOLIDS &  
DEBRIS

EPA Waste Code:  
DOT Shipping Name: Toxic solid, corrosive, inorganic, n.o.s.  
DOT Hazard Class: 6.1  
DOT I.D. No. UN3290  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 6: ALKALI SOLIDS, SOLIDS, DEBRIS AND RESIDUES CONTAINING  
HEAVY METALS**

Waste Description: ALKALI SOLIDS, SOLIDS, DEBRIS AND RESIDUES  
CONTAINING HEAVY METALS

EPA Waste Code:  
DOT Shipping Name: Corrosive solids, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN1759  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 7: CONTAMINATED CORROSIVE & TOXIC SOILS, SOLIDS & DEBRIS**

Waste Description: CONTAMINATED CORROSIVE & TOXIC SOILS, SOLIDS &  
DEBRIS

EPA Waste Code:

DOT Shipping Name: Corrosive solids, toxic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN2923  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 8: CONTAMINATED CORROSIVE & BASIC, INORGANIC SOILS, SOLIDS & DEBRIS**

Waste Description: CONTAMINATED CORROSIVE & BASIC, INORGANIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:  
DOT Shipping Name: Corrosive solid, basic, inorganic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3262  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 9: CONTAMINATED ORGANIC CORROSIVE & BASIC SOILS, SOLIDS & DEBRIS**

Waste Description: CONTAMINATED ORGANIC CORROSIVE & BASIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:  
DOT Shipping Name: Corrosive solid, basic, organic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3263  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 10: NEUTRALIZED SOILS, SOLIDS, DEBRIS & RESIDUES FROM METAL FINISHING WASTE TREATMENT PROCESSES**

Waste Description: NEUTRALIZED SOILS, SOLIDS, DEBRIS & RESIDUES FROM METAL FINISHING WASTE TREATMENT PROCESSES

EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 11: ORGANIC DEBRIS**

Waste Description: ORGANIC DEBRIS  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 12: INORGANIC DEBRIS**

Waste Description: INORGANIC DEBRIS  
EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 13: SOLIDS/SLUDGES FROM PETROLEUM REFINERY**

Waste Description: SOLIDS/SLUDGES FROM PETROLEUM REFINERY  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 16000 US Tons - (2,000 pounds)  
Estimated Frequency: 800 loads Annually

**Waste Stream 14: SOIL, SOLID & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS & PESTICIDES**

Waste Description: SOIL, SOLID & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS & PESTICIDES  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 15: SOIL, SOLIDS & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS**

Waste Description: SOIL, SOLIDS & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 16: SOLIDS, SOILS & SLUDGES WITH ORGANICS**

Waste Description: SOLIDS, SOILS & SLUDGES WITH ORGANICS  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3077  
Total Volume to be Exported: 8000 US Tons - (2,000 pounds)  
Estimated Frequency: 400 loads Annually

**Waste Stream 17: SOLIDS, SOILS & SLUDGES WITH INORGANICS**

Waste Description: SOLIDS, SOILS & SLUDGES WITH INORGANICS  
EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.  
DOT Hazard Class: 9

DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

**Waste Stream 18: ORGANIC SOLID WASTE FROM TRANSFER STATION**

Waste Description: ORGANIC SOLID WASTE FROM TRANSFER STATION

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

**Waste Stream 19: INORGANIC SOLID WASTE FROM TRANSFER STATION**

Waste Description: INORGANIC SOLID WASTE FROM TRANSFER STATION

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

**Waste Stream 20: SPENT HALOGENATED SOLVENTS & SLURRIES**

Waste Description: SPENT HALOGENATED SOLVENTS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Toxic, liquids, organic, n.o.s.

DOT Hazard Class: 6.1

DOT I.D. No. UN2810

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

**Waste Stream 21: SPENT TOXIC, INORGANIC LIQUIDS & SLURRIES**

Waste Description: SPENT TOXIC, INORGANIC LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Toxic liquid, inorganic, n.o.s.

DOT Hazard Class: 6.1

DOT I.D. No. UN3287

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

**Waste Stream 22: ALKALINE SOLUTIONS CONTAINING HEAVY METALS**

Waste Description: ALKALINE SOLUTIONS CONTAINING HEAVY METALS

EPA Waste Code:

DOT Shipping Name: Caustic alkali liquids, n.o.s.

DOT Hazard Class: 8

DOT I.D. No. UN1719

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 23: WASTE ACIDS**

Waste Description: WASTE ACIDS



EPA Waste Code:  
DOT Shipping Name: Chromic acid solution  
DOT Hazard Class: 8  
DOT I.D. No. UN1755  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 24: WASTE CORROSIVE LIQUIDS & SLURRIES**

Waste Description: WASTE CORROSIVE LIQUIDS & SLURRIES  
EPA Waste Code:  
DOT Shipping Name: Corrosive liquids, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN1760  
Total Volume to be Exported: 4000000 Gallons (US)  
Estimated Frequency: 800 loads Annually

**Waste Stream 25: WASTE ACIDS**

Waste Description: WASTE ACIDS  
EPA Waste Code:  
DOT Shipping Name: Nitrating acid mixtures with not more than 50 percent nitric acid  
DOT Hazard Class: 8  
DOT I.D. No. UN1796  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 26: HYDROXIDE SOLUTIONS**

Waste Description: HYDROXIDE SOLUTIONS  
EPA Waste Code:  
DOT Shipping Name: Sodium hydroxide solution  
DOT Hazard Class: 8  
DOT I.D. No. UN1824  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 27: BLENDED/BULKED NON-HALOGENATED, CORROSIVE, TOXIC LIQUIDS & SLURRIES**

Waste Description: BLENDED/BULKED NON-HALOGENATED, CORROSIVE, TOXIC LIQUIDS & SLURRIES  
EPA Waste Code:  
DOT Shipping Name: Corrosive liquids, toxic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN2922  
Total Volume to be Exported: 4000000 Gallons (US)  
Estimated Frequency: 800 loads Annually

**Waste Stream 28: WASTE ACIDS**

Waste Description: WASTE ACIDS  
EPA Waste Code:  
DOT Shipping Name: Battery fluid, acid  
DOT Hazard Class: 8  
DOT I.D. No. UN2796

Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 29: WASTE CORROSIVE ACIDIC, INORGANIC LIQUIDS AND SLURRIES**

Waste Description: WASTE CORROSIVE ACIDIC, INORGANIC LIQUIDS AND SLURRIES

EPA Waste Code:  
DOT Shipping Name: Corrosive liquid, acidic, inorganic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3264  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 30: WASTE CORROSIVE ACIDIC, ORGANIC LIQUIDS AND SLURRIES**

Waste Description: WASTE CORROSIVE ACIDIC, ORGANIC LIQUIDS AND SLURRIES

EPA Waste Code:  
DOT Shipping Name: Corrosive liquid, acidic, organic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3265  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 31: WASTE CORROSIVE LIQUIDS & SLURRIES**

Waste Description: WASTE CORROSIVE LIQUIDS & SLURRIES

EPA Waste Code:  
DOT Shipping Name: Corrosive liquid, basic, inorganic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3266  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 32: WASTE CORROSIVE BASIC, ORGANIC, LIQUIDS & SLURRIES**

Waste Description: WASTE CORROSIVE BASIC, ORGANIC, LIQUIDS & SLURRIES

EPA Waste Code:  
DOT Shipping Name: Corrosive liquid, basic, organic, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN3267  
Total Volume to be Exported: 2000000 Gallons (US)  
Estimated Frequency: 400 loads Annually

**Waste Stream 33: NEUTRALIZED SOLUTIONS FROM METAL FINISHING WASTE TREATMENT PROCESSES**

Waste Description: NEUTRALIZED SOLUTIONS FROM METAL FINISHING WASTE TREATMENT PROCESSES

EPA Waste Code:  
DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.  
DOT Hazard Class: 9  
DOT I.D. No. UN3082  
Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 34: PETROLEUM REFINERY WASTE LIQUIDS**

Waste Description: PETROLEUM REFINERY WASTE LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 35: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE**

Waste Description: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 36: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE**

Waste Description: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 37: AQUEOUS LIQUIDS WITH METALS AND INORGANICS**

Waste Description: AQUEOUS LIQUIDS WITH METALS AND INORGANICS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 38: HALOGENATED/NON-HALOGENATED ORGANIC RICH LIQUIDS**

Waste Description: HALOGENATED/NON-HALOGENATED ORGANIC RICH LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 39: HALOGENATED/NON-HALOGENATED LEAN ORGANIC LIQUIDS**

Waste Description: HALOGENATED/NON-HALOGENATED LEAN ORGANIC LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 40: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE**

Waste Description: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

**Waste Stream 41: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE**

Waste Description: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

The following Waste Codes apply to the above Waste Streams:

D001 ,D002 ,D003 ,D004 ,D005 ,D006 ,D007 ,D008 ,D009 ,D010 ,D011 ,D012 ,D013 ,D014 ,D015 ,D016 ,D017 ,D018 ,D019 ,D020 ,D021 ,D022 ,D023 ,D024 ,D025 ,D026 ,D027 ,D028 ,D029 ,D030 ,D031 ,D032 ,D033 ,D034 ,D035 ,D036 ,D037 ,D038 ,D039 ,D040 ,D041 ,D042 ,D043 ,F001 ,F002 ,F003 ,F004 ,F005 ,F006 ,F007 ,F008 ,F009 ,F010 ,F011 ,F012 ,F019 ,F024 ,F025 ,F032 ,F035 ,F037 ,F038 ,F039 ,K001 ,K002 ,K003 ,K004 ,K005 ,K006 ,K007 ,K008 ,K009 ,K010 ,K011 ,K013 ,K014 ,K015 ,K016 ,K017 ,K018 ,K019 ,K020 ,K021 ,K022 ,K023 ,K024 ,K025 ,K026 ,K027 ,K028 ,K029 ,K030 ,K031 ,K032 ,K033 ,K034 ,K035 ,K036 ,K037 ,K038 ,K039 ,K040 ,K041 ,K042 ,K043 ,K044 ,K045 ,K046 ,K047 ,K048 ,K049 ,K050 ,K051 ,K052 ,K060 ,K061 ,K062 ,K064 ,K065 ,K066 ,K069 ,K071 ,K073 ,K083 ,K084 ,K085 ,K086 ,K087 ,K088 ,K090 ,K091 ,K093 ,K094 ,K095 ,K096 ,K097 ,K098 ,K099 ,K100 ,K101 ,K102 ,K103 ,K104 ,K105 ,K106 ,K107 ,K108 ,K109 ,K110 ,K111 ,K112 ,K113 ,K114 ,K115 ,K116 ,K117 ,K118 ,K123 ,K124 ,K125 ,K126 ,K131 ,K132 ,K136 ,K141 ,K142 ,K143 ,K144 ,K145 ,K147 ,K148 ,K149 ,K150 ,K151 ,K156 ,K157 ,K158 ,K159 ,K161 ,K169 ,K170 ,K171 ,K172 ,K174 ,K175 ,P001 ,P002 ,P003 ,P004 ,P005 ,P006 ,P007 ,P008 ,P009 ,P010 ,P011 ,P012 ,P013 ,P014 ,P015 ,P016 ,P017 ,P018 ,P020 ,P021 ,P022 ,P023 ,P024 ,P026 ,P027 ,P028 ,P029 ,P030 ,P031 ,P033 ,P034 ,P036 ,P037 ,P038 ,P039 ,P040 ,P041 ,P042 ,P043 ,P044 ,P045 ,P046 ,P047

,P048 ,P049 ,P050 ,P051 ,P054 ,P056 ,P057 ,P058 ,P059 ,P060 ,P062 ,P063 ,P064 ,P065 ,P066 ,P067 ,P068 ,P069 ,P070 ,P071 ,P072 ,P073 ,P074 ,P075 ,P076 ,P077 ,P078 ,P081 ,P082 ,P084 ,P085 ,P087 ,P088 ,P089 ,P092 ,P093 ,P094 ,P095 ,P096 ,P097 ,P098 ,P099 ,P101 ,P102 ,P103 ,P104 ,P105 ,P106 ,P108 ,P109 ,P110 ,P111 ,P112 ,P113 ,P114 ,P115 ,P116 ,P118 ,P119 ,P120 ,P121 ,P122 ,P123 ,P127 ,P128 ,P185 ,P188 ,P189 ,P190 ,P191 ,P192 ,P194 ,P196 ,P197 ,P198 ,P199 ,P201 ,P202 ,P203 ,P204 ,P205 ,U001 ,U002 ,U003 ,U004 ,U005 ,U006 ,U007 ,U008 ,U009 ,U010 ,U011 ,U012 ,U014 ,U015 ,U016 ,U017 ,U018 ,U019 ,U020 ,U021 ,U022 ,U023 ,U024 ,U025 ,U026 ,U027 ,U028 ,U029 ,U030 ,U031 ,U032 ,U033 ,U034 ,U035 ,U036 ,U037 ,U038 ,U039 ,U041 ,U042 ,U043 ,U044 ,U045 ,U046 ,U047 ,U048 ,U049 ,U050 ,U051 ,U052 ,U053 ,U055 ,U056 ,U057 ,U058 ,U059 ,U060 ,U061 ,U062 ,U063 ,U064 ,U066 ,U067 ,U068 ,U069 ,U070 ,U071 ,U072 ,U073 ,U074 ,U075 ,U076 ,U077 ,U078 ,U079 ,U080 ,U081 ,U082 ,U083 ,U084 ,U085 ,U086 ,U087 ,U088 ,U089 ,U090 ,U091 ,U092 ,U093 ,U094 ,U095 ,U096 ,U097 ,U098 ,U099 ,U101 ,U102 ,U103 ,U105 ,U106 ,U107 ,U108 ,U109 ,U110 ,U111 ,U112 ,U113 ,U114 ,U115 ,U116 ,U117 ,U118 ,U119 ,U120 ,U121 ,U122 ,U123 ,U124 ,U125 ,U126 ,U127 ,U128 ,U129 ,U130 ,U131 ,U132 ,U133 ,U134 ,U135 ,U136 ,U137 ,U138 ,U140 ,U141 ,U142 ,U143 ,U144 ,U145 ,U146 ,U147 ,U148 ,U149 ,U150 ,U151 ,U152 ,U153 ,U154 ,U155 ,U156 ,U157 ,U158 ,U159 ,U160 ,U161 ,U162 ,U163 ,U164 ,U165 ,U166 ,U167 ,U168 ,U169 ,U170 ,U171 ,U172 ,U173 ,U174 ,U176 ,U177 ,U178 ,U179 ,U180 ,U181 ,U182 ,U183 ,U184 ,U185 ,U186 ,U187 ,U188 ,U189 ,U190 ,U191 ,U192 ,U193 ,U194 ,U196 ,U197 ,U200 ,U201 ,U202 ,U203 ,U204 ,U205 ,U206 ,U207 ,U208 ,U209 ,U210 ,U211 ,U213 ,U214 ,U215 ,U216 ,U217 ,U218 ,U219 ,U220 ,U221 ,U222 ,U223 ,U225 ,U226 ,U227 ,U228 ,U234 ,U235 ,U236 ,U237 ,U238 ,U239 ,U240 ,U243 ,U244 ,U246 ,U247 ,U248 ,U249 ,U271 ,U278 ,U279 ,U280 ,U328 ,U353 ,U359 ,U364 ,U367 ,U372 ,U373 ,U387 ,U389 ,U394 ,U395 ,U404 ,U409 ,U410 ,U411

You may ship this waste to the following receiving facility/foreign importer:

CLEAN HARBORS CANADA, INC.  
4090 TELFER ROAD,  
CORUNNA, ON, CA  
ON0039017

Shipments may occur during the period from May 30, 2013, to May 29, 2014.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))
2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(c))
3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)
6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Amanda Finnell, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202/564-1956, fax number 202/564-0025, [finnell.amanda@epa.gov](mailto:finnell.amanda@epa.gov).

Sincerely,



Robert G. Heiss, Director  
International Compliance Assurance Division  
Office of Federal Activities



SECTION OF WEEKLY  
INSPECTION LOG SHOWING  
12/2/13 INSPECTION OF 90-DAY  
PAD WAS COMPLETED BUT COULD  
NOT BE ENTERED IN THE SYSTEM  
DUE TO SYSTEM FAILURE





<u>Edit</u>	CL	90 Day Pad	Outdoor Storage Pad	CONTAINER STAGING	PERMIT REQD	DAY - 5 DAYS	12/2/2013	CO Template Container Storage	System issue; paper copy on file
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